EPA Question	Response	Records/Information Available
Section 1.0 - Respondent Information		
1. Provide the full legal, registered name and mailing address of Respondent.	Portland General Electric Company 121 SW Salmon Street Portland, OR 97204	
2. For each person answering these questions on behalf of Respondent, provide:		
Site Owner/Operator: Portland General Electric		
a. full name;	Arya Behbehani-Divers	
b. title;	Manager, Environmental Services	
c. business address; and	121 SW Salmon Street m/s 3WTCBR05 Portland, OR 97204	
d. business telephone number, electronic mail address, and FAX machine number.	Business Telephone Number: 503-464-8141 Electronic Mail Address: Arya.Behbehani-Divers@pgn.com Fax Number: 503-464-8527	
Site Consultant: URS Corporation		
a. full name;	Laura McWilliams PhD, L.G.; Heather Patterson; Danni Kline	
b. title;	Senior Geologist; Environmental Scientist & Risk Assessor; Ecologist	
c. business address: and	111 SW Columbia, Suite 1500 Portland, OR 97225-5850	
d. business telephone number, electronic mail address, and FAX machine number.	Business Telephone Number: 503-222-7200 Electronic Mail Address: Laura_Mcwilliams@urscorp.com; Heather_Patterson@urscorp.com; Danni_Kline@urscorp.com Fax Number: 503-222-4292	
3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, fax number, and, if available, electronic mail address.	Arya Behbehani-Divers Portland General Electric Manager, Environmental Services 121 SW Salmon Street - 3WTCBR05 Portland, OR 97204 Telephone Number: 503-464-8141 Fax Number: 503-464-8527 Electronic Mail Address: Arya.Behbehani-Divers@pgn.com	

EPA Question	Response	Records/Information Available
Section 2.0 - Owner/Operator Information		
4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 to Present). Please note that this question includes any aquatic lands owned or leased by Respondent.	Portland General Electric Company (PGE) is preparing separate 104(e) responses for properties within the Investigation Area. This response only applies to Station L, located in Portland, Oregon on the eastern shore of the Willamette River below and just south of the Marquam (Interstate 5) Bridge between SE Market Street and SE Caruthers Street. As shown in the attached plat (Q04_Plats.pdf and Q04_2006 Plats.pdf), this Station L 104(e) response includes nine parcels historically owned by PGE and designated with the letters "A" through "I." They are hereafter collectively referred to as "Station L," "the Property," or "the Site". For questions that are applicable to individual parcels, individual answers are listed in each response.	Question 4 Attachments Q04_2006 Plats.pdf Q04_Plats.pdf
a. Currently Owns	Not applicable. PGE does not currently own Station L.	
b. Currently Leases	PGE currently leases 20 motor vehicle parking spaces from the Oregon Museum of Science and Industry (OMSI) for use by PGE employees, agents, and contractors. The parking spaces are located within Parcel A at the northernmost end of OMSI's parking lot. The lease term is from 1 February 2006 until 21 January 2011. See the attached document (Q04_2006 Plats.pdf), as well as the document (Q07_2006-02-01 OMSI Parking Lease.pdf) attached in response to Question 7.	Question 4 Attachment Q04_2006 Plats.pdf Also see Question 7 Attachment Q07_2006-02-01 OMSI Parking Lease.pdf
c. Currently Operates	PGE does not currently have power plant or substation operations at Station L. PGE no longer has involvement with Station L, except for the continued monitoring of the sediment cap within the Willamette River (adjacent to Parcels D and E), the lease of 20 motor vehicle parking spaces from OMSI, the common roadway easement (SE Water Ave) through Station L for access to Stephens Substation, and maintenance of the distribution network on Parcels A, C, E, H, and I, as needed. The PGE distribution network within the Investigation Area is addressed in a separate 104(e) response; see the separate 104(e) response for Miscellaneous Spills, Distribution Network, and Submerged Cables. Also see the separate 104(e) response for Stephens Substation.	
d. Currently otherwise affiliated with	To the best of PGE's knowledge, after reasonable inquiry, the only current affiliation PGE has with Station L is for the continued monitoring of the sediment cap within the Willamette River (adjacent to Parcels D and E), for the lease of 20 motor vehicle parking spaces from OMSI, the common roadway easement (SE Water Ave) through Station L for access to Stephens Substation, and maintenance of the distribution network on Parcels A, C, E, H, and I, as needed. The PGE distribution network within the Investigation Area is addressed in a separate 104(e) response (see the separate 104(e) response for Miscellaneous Spills, Distribution Network, and Submerged Cables); therefore, the remainder of this response only addresses Station L during PGE's historical ownership. Also see the separate 104(e) response for Stephens Substation.	
e. Historically Has Owned	PGE historically owned Station L. See the attached plats (Q04_Plats.pdf and Q04_2006 Plats.pdf).	Question 4 Attachments Q04_2006 Plats.pdf Q04_Plats.pdf

EPA Question	Response	Records/Information Available
f. Historically Has Leased	To the best of PGE's knowledge, after reasonable inquiry, the following summarizes PGE's historical leases: • PGE historically leased 7,240 square feet in Block 47, which is adjacent to Parcel F, and 500 square feet in Block 48, which is adjacent to Parcel I. Portland Electric Power Company (PEPCO, a PGE predecessor company) sold these parcels to the Southern Pacific Transportation Company (Southern Pacific Co) on 28 December 1928 and PGE leased them from Southern Pacific Co on a monthly basis starting on 16 September 1931; see the attached plat (Q04_Plats.pdf). To the best of PGE's knowledge, after reasonable inquiry, PGE does not know when PGE ceased leasing the property; however, it likely ceased by 1975 when the Station L power plant was retired. PGE's historical ownership of this property is not addressed in this response because it was sold prior to the investigation period (1937 – present). • PGE historically leased Parcels A through F from OMSI beginning on 31 December 1986, the same date on which PGE donated these parcels to OMSI. The term of the lease was from 31 December 1986 until 30 June 1988; see the documents (Q07_1986-12-31 OMSI Lease Agreement.pdf, Q07_1988-06-22 PGE-OMSI Lease Terms.pdf, and Q07_1986-12-31 OMSI_Donation and Accpt Agrmnt.pdf) attached in response to Question 7. The lease was extended though 15 November 1988 for Parcel A. The lease was granted to enable PGE to conduct remediation activities on the parcels as specified in the donation contingency. • PGE historically leased the western lot (Lot 3) of Parcel I from OMSI for one month, which PGE donated to OMSI on 30 December 2005. The lease term was from 29 December 2005 through 31 January 2006. This lease was granted to allow PGE to enough time to remove its equipment from the parcel after donating the parcel to OMSI. See the attached plat (Q04_2006 Plats.pdf), as well as documents (Q07_2005-12-30 OMSI Deed Lots 3&4.pdf and Q07_2005-12-29 OMSI Lease Lot 3.pdf) attached in response to Question 7.	Question 4 Attachments Q04_2006 Plats.pdf Q04_Plats.pdf Also see Question 7 Attachments Q07_2005-12-30 OMSI Deed Lots 3&4.pdf Q07_2005-12-29 OMSI Lease Lot 3.pdf Q07_1986-12-31 OMSI Lease Agreement.pdf Q07_1988-06-22 PGE-OMSI Lease Terms.pdf Q07_1986-12-31 OMSI_Donation and Accpt Agrmnt.pdf
g. Historically Has Operated	PGE historically owned and operated Station L. See the attached plats (Q04_Plats.pdf and Q04_2006 Plats.pdf).	Question 4 Attachments Q04_2006 Plats.pdf Q04_Plats.pdf
h. Historically otherwise affiliated with	To the best of PGE's knowledge, after reasonable inquiry, Station L was historically affiliated during the investigation period with Stephens Substation, which was historically purchased as part of Station L, and the PGE properties to the east and north (historical Property iv) and to the south (Springwater Corridor and Oaks Bottom) for continuation of railway operations. Since PGE has retained the Stephens Substation and continues to use the site as a substation, the Stephens Substation is addressed in a separate 104(e) response and is not addressed further in this response. The Historical Properties, Springwater Corridor, and Oaks Bottom are addressed in separate 104(e) responses and are not addressed further in this response. In addition, as described in the attached document (Q04h_1950-02-20 PTC vacate.pdf), PGE had a drag line power house, high-tension poles, and a fence within Portland Traction	Question 4 Attachment Q04h_1950-02-20 PTC vacate.pdf

EPA Question	Response	Records/Information Available
	Company's (PTC) property (adjacent to Parcels A, B, and C) until 1950, at which point, to the best of PGE's knowledge, after reasonable inquiry, they were removed from PTC's property.	
5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.		
a. Relationship	PGE is the historical owner of Station L.	
b. Address	The current site addresses for the Station L parcels are: • Parcels A, B, C, D, E, and F: 1701 SE Water Avenue, Portland, Oregon • Parcel G: No site address (roadway) • Parcel H: 211 SE Caruthers Street, Portland, Oregon • Parcel I: 2015 SE Water Avenue, Portland, Oregon	
c. Multnomah County Alternative Tax ID Number	The current Multnomah County Alternative Tax ID numbers for the Station L parcels are: • Parcel A – R991030800 (northern portion) and R991030760 (northern portion) • Parcel B – R991030800 (southern portion), R991030760 (southern portion), and R991030750 • Parcel C – R991030700 (northern portion), R991030770, R991030690 (northern portion), and R991030790 • Parcel D – R991030700 (southern portion) and R991030690 (southwest portion) • Parcel E – R991030700 (middle portion), R991030690 (southeastern portion), and R74001800 (southwestern portion) • Parcel F – R991030690 (eastern-middle portion), R74001800 (northeastern portion) • Parcel G – No tax ID number (roadway)	Question 5 Attachments Q05c_TaxMaps.pdf Q05c_Property Detail_Parcels.pdf Also see Question 4 Attachments Q04_Plats.pdf Q04_2006 Plats.pdf

EPA Question	Response	Records/Information Available
	• Parcel H – R668200050 and R668200100 • Parcel I – R668200150 and R668200200 The attached Portland Maps property details (Q05c_Property Detail_Parcels.pdf) show approximate boundaries of historical PGE ownership in relation to current tax lot and roadway boundaries. Also see the attached tax maps (Q05c_TaxMaps.pdf). Also see the documents (Q04_Plats.pdf and Q04_2006 Plats.pdf) attached in response to Question 4.	
d. Date Acquired (leased)	The documents (Q04_2006 Plats.pdf and Q04_Plats.pdf) attached in response to Question 4 indicate when PGE or a PGE predecessor company (i.e., Oregon Water Power & Railway Co [OWPR], Pacific Railway Light & Power Co [PRLP], City & Suburban Railway Co [CSRC], or Pacific Northwest Public Service Co [PNPS]) acquired Station L. To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the date that the Station L parcels were acquired by PGE (or a PGE predecessor company): • Parcels A and C were purchased by PGE (as predecessor company OWPR) on 25 March 1905 from The Land Company of Oregon. • Parcel B was leased by PGE (as predecessor company OWPR) from 1904 to 1937. The parcel was originally leased by Fred S Morris on 28 February 1902 from the Stephens Land Co for a term of 30 years; however, the lease was assumed by PGE (as predecessor company OWPR) on 23 November 1904. On 4 June 1937, PGE (as predecessor company PNPS) purchased Parcel B from HJ and Mable Wallace. • Parcel D was purchased by PGE (as predecessor company CSRC) on 30 September 1902 from the Ladd Estate. • Parcel E was acquired through the following transactions: o On 31 December 1954, PGE acquired Lots 27 and 34, as well as the interest in the northern half of SE Lincoln St from the Georgia Pacific Plywood Company; see the documents (Q07_1954-12-30 Conveyance of Rights.pdf and Q07_1954-12-31 Deed_GP to PGE.pdf) attached in response to Question 7. o On 1 June 1955, the City of Portland conveyed its interest in the vacated portion of SE Lincoln St (southern half), SE First Ave, and SE Second Ave to PGE through Ordinance 102169; see the document (Q07_1955 COP Ord 102169.pdf) attached in response to Question 7. Also see the associated documents (Q07_1955-04-18 COP Resolution 26492.pdf and Q07_1955-01-24 Petition to COP for Vacation.pdf) attached in response to Question 7. • Parcel F was acquired through the following transactions: o On 14 December 1909, the northeast corner of Block 34, the western portion of Block 47, and the northern half of SE Lincoln St within Parcel F was purchased	See Question 4 Attachments Q04_Plats.pdf Q04_2006 Plats.pdf Also see Question 7 Attachments Q07_1954-12-30 Conveyance of Rights.pdf Q07_1954-12-31 Deed_GP to PGE.pdf Q07_1955 COP Ord 102168.pdf Q07_1955 COP Ord 102169.pdf Q07_1955-01-24 Petition to COP for Vacation.pdf Q07_1955-04-18 COP Resolution 26491.pdf Q07_1955-04-18 COP Resolution 26492.pdf Q07_1955-07-01 Deeds_GP to PGE.pdf Q07_1957 COP Ord 106070.pdf Q07_1957-03-28 COP Resolution 27242.pdf Q07_1957-05-22 COP Street Vacation Ord 105941.pdf Q07_1990-05-01 DSL Ownership Investigation.pdf Q07_1990-08-15 DSL QuitClaim Deeds.pdf

EPA Question	Response	Records/Information Available
	by PGE (as predecessor company PRLP) from Inman-Poulsen Lumber Co. o To the best of PGE's knowledge, after reasonable inquiry and based on the City of Portland Auditor's Office information available online, the City of Portland conveyed its interest in the vacated portion of SE Third Ave to PGE through Ordinance 123419 in October 1966. o On 1 June 1955, the City of Portland conveyed its interest in the vacated portion of SE Lincoln St (southern half) to PGE through Ordinance 102169; see the document (Q07_1955 COP Ord 102169.pdf) attached in response to Question 7. Also see the associated documents (Q07_1955-04-18 COP Resolution 26492.pdf and Q07_1955-01-24 Petition to COP for Vacation.pdf) attached in response to Question 7. • Parcel G (historically SE Second Ave, renamed SE Water Ave) was acquired through the following transactions: o On 1 July 1955, PGE purchased the vacated portion of SE Second Ave (which was previously vacated under Ordinance 102168) from the Georgia Pacific Plywood Company; see the documents (Q07_1955-07-01 Deeds_GP to PGE.pdf and Q07_1955 COP Ord 102168.pdf) attached in response to Question 7. Also see the associated City of Portland Resolutions 26491 and 26492 (Q07_1955-04-18 COP Resolution 26491.pdf and Q07_1955-04-18 COP Resolution 26492.pdf) attached in response to Question 7. o On 17 May 1957, the City of Portland conveyed its interest in the vacated portion of SE Second Ave within to PGE through Ordinance 105941, amended by Ordinance 106070; see the attached documents (Q07_1957-05-22 COP Street Vacation Ord 105941.pdf and Q07_1957 COP Ord 106070.pdf) attached in response to Question 7. Also see the associated City of Portland Resolution 27242 (Q07_1957-03-28 COP Resolution 27242.pdf) attached in response to Question 7. • Parcel H was acquired through the following transactions: o On 14 December 1909, PGE purchased the 0.07 acres of land in the northeast portion of Parcel H (identified as 'A' within Parcel H) from Inman-Poulsen Lumber Company. o On 1 July 1955, Georgia Pacific Plywood Company conveyed a 4 foot by 17.5 foot irregular portion of Block 49 (identified as 'D' within Parcel H), as well as its interest in Blocks 29, 32, and 49 and the vacated portions of SE Sherman St and SE Third Ave, to PGE; see the document (Q07_1955-07-01 Deeds_GP to PGE.pdf) attached in response to Question 7. o On 17 May 1957, the City of Portland conveyed its interest in Blocks 29 (eastern portion), 32, and 49 (western portion) and the vacated portion of SE Third Ave within Parcel H to PGE through Ordinance 105941, amended by Ordinance 106070; see the attached documents (Q07_1957-05-22 COP Street Vacation Ord 105941.pdf and Q07_1957 COP Ord 106070.pdf) attached in response to Question 7. Also see the associated City of Portland Resolution 27242	

EPA Question	Response	Records/Information Available
	(Q07_1957-03-28 COP Resolution 27242.pdf) attached in response to Question 7. • Parcel I was acquired through the following transactions: o On 14 December 1909, PGE purchased the 0.50 acres of land in the northeast portion of Parcel I (identified as 'A' within Parcel I) from Inman-Poulsen Lumber Company. o On 1 June 1955, the City of Portland conveyed its interest in the vacated portion of SE Grant St to PGE through Ordinance 102168; see the document (Q07_1955 COP Ord 102168.pdf) attached in response to Question 7. Also see the associated City of Portland Resolutions 26491 and 26492 (Q07_1955-04-18 COP Resolution 26491.pdf and Q07_1955-04-18 COP Resolution 26492.pdf) attached in response to Question 7. o On 1 July 1955, Georgia Pacific Plywood Company conveyed Blocks 13, 28, 33, and 48 (western portion) and the vacated portions of SE Sherman St, SE First Ave, and SE Third Ave (which were previously vacated under Ordinance 102168 and Ordinance 105941, amended by Ordinance 106070), as well its interest in the western portion of Block 29 within Parcel I, to PGE; see the documents (Q07_1955-07-01 Deeds_GP to PGE.pdf, Q07_1955 COP Ord 102168.pdf, Q07_1957-05-22 COP Street Vacation Ord 105941.pdf, and Q07_1957 COP Ord 106070.pdf) attached in response to Question 7. Also see the associated City of Portland Resolutions 26491, 26492, and 27242 (Q07_1955-04-18 COP Resolution 26491.pdf, Q07_1955-04-18 COP Resolution 26492.pdf, and Q07_1957-03-28 COP Resolution 27242.pdf) attached in response to Question 7. o On 17 May 1957, the City of Portland conveyed its interest in the western portion of Block 29 to PGE through Ordinance 105941 and as amended by Ordinance 106070; see the attached documents (Q07_1957-05-22 COP Street Vacation Ord 105941.pdf and Q07_1957 COP Ord 106070.pdf) attached in response to Question 7. Also see the associated City of Portland Resolution 27242 (Q07_1957-03-28 COP Resolution 27242.pdf) attached in response to Question 7. o On 29 August 1990, the State of Oregon Division of State Lands (DSL) issued PGE a quitclaim deed on the previously submerged lands lying above the ordinary low water line as it existed in 1990 (identified as 'L' within Parcel I), thereby releasing any claim the state may have had; see the document (Q07_1990-08-15 DSL QuitClaim Deeds.pdf) attached in response to Question 7. Also see the associated ownership investigation document (Q07_1990-05-01 DSL Ownership Investigation.pdf) attached in response to Question 7. For historical and current PGE leases at Station L not associated with PGE's acquisition (purchase) of Station L, see the responses to Questions 4b, 4f, 5e, and 7.	
e. Period of Lease	The documents (Q04_2006 Plats.pdf and Q04_Plats.pdf) attached in response to Question 4 indicate when PGE or a PGE predecessor company (i.e., OWPR) leased portions of Station L. To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the PGE	See Question 4 Attachments Q04_Plats.pdf Q04_2006 Plats.pdf

EPA Question	Response	Records/Information Available
	periods of leases at Station L: • PGE (as predecessor company OWPR) leased Parcel B from 1904 to 1937, after which PGE purchased the parcel. PGE assured the lease of the parcel from Fred S Morris, who was leasing the parcel from the Stephens Land Co. • PGE leased 7,240 square feet in Block 47 which was adjacent to Parcel F, and 500 square feet in Block 48 which was adjacent to Parcel I on a monthly basis starting on 16 September 1931. PEPCO (a PGE predecessor company) sold these parcels to the Southern Pacific Co on 28 December 1928. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know when PGE ceased leasing the property; however, it likely ceased by 1975 when the Station L power plant was retired. • From 1986 to 1988, PGE leased Parcels A through F from OMSI, to whom PGE had donated these parcels. The term of the lease was from 31 December 1986 until 30 June 1988; see the documents (Q07_1986-12-31 OMSI Lease Agreement.pdf, Q07_1988-06-22 PGE-OMSI Lease Terms.pdf, and Q07_1986-12-31 OMSI_Donation and Accpt Agrmnt.pdf) attached in response to Question 7. The lease was extended though 15 November 1988 for Parcel A. The lease was granted to enable PGE to conduct remediation activities on these parcels as specified by the donation contingency • PGE leased the western lot (Lot 3) of Parcel I from OMSI for one month from 29 December 2005 through 31 January 2006. PGE donated this parcel to OMSI on 30 December 2005 and this lease was granted to allow PGE to enough time to remove its equipment from the parcel following the donation. See the documents (Q07_2005-12-30 OMSI Deed Lots 3&4.pdf and Q07_2005-12-29 OMSI Lease Lot 3.pdf) attached in response to Question 7. • PGE currently leases 20 motor vehicle parking spaces from OMSI, which are located in the northernmost end of OMSI's parking lot, for use by PGE employees, agents, and contractors. The lease term is from 1 February 2006 until 31 January 2011. See the document (Q07_2006-02-01 OMSI Parking Lease.pdf) attached in response to Question 7.	Also see Question 7 Attachments Q07_1986-12-31 OMSI Lease Agreement.pdf Q07_1986-12-31 OMSI_Donation and Accpt Agrmnt.pdf Q07_1988-06-22 PGE-OMSI Lease Terms.pdf Q07_2005-12-29 OMSI Lease Lot 3.pdf Q07_2005-12-30 OMSI Deed Lots 3&4.pdf Q07_2006-02-01 OMSI Parking Lease.pdf
f. Period of Ownership, Lease or Operation	The documents (Q04_2006 Plats.pdf and Q04_Plats.pdf) attached in response to Question 4 indicate when PGE or a PGE predecessor company (i.e., OWPR, PRLP, CSRC, or PNPS) owned and leased portions of Station L. To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the period of ownership and/or operation of the Station L parcels by PGE (or a PGE predecessor company): • Parcels A and C: 1905 – 1986 (ownership & operation) • Parcel B: 1904 – 1937 (lease); 1937 – 1986 (ownership); 1905 – 1986 (operation)	See Question 4 Attachments Q04_Plats.pdf Q04_2006 Plats.pdf

EPA Question	Response	Records/Information Available
	• Parcel D: 1902 – 1986 (ownership); 1901 – 1986 (operation) • Parcel E: 1954/1955 – 1986 (ownership & operation) • Parcel F: 1909 – 1986 (ownership & operation) • Parcel G: 1955/1957 – 1986 (ownership & operation) • Parcel H: 1909/1955/1957 – 1995 (ownership); 1909/1955/1957 – 1986 (operation) • Parcel I: 1909/1955/1957 – 2005 (ownership & operation) See the response to Question 5e for the periods of PGE leases at portions of Station L.	
g. Activities	The activities conducted at Station L changed over time. To the best of PGE's knowledge, after reasonable inquiry, the following describes the primary/major PGE activities and operations at Station L: <u>Station F Power Plant</u> PGE operated the Station F power plant, a steam-powered electricity generating plant, on Parcel D from approximately 1901 to 1911 (prior to the investigation period, 1937 to present). Please note that operations at Station F power plant ceased prior to the generalized marketing of polychlorinated biphenyls (PCBs) in the United States which began in 1929. To the best of PGE's knowledge, after reasonable inquiry, the following summarizes PGE's activities associated with the Station F Power Plant: • PGE (as predecessor company CSRC) acquired the Station F Power Plant in 1902 when it purchased Parcel D from the Ladd Estate, but PGE (as predecessor company CSRC) appears to have been operating the power plant as early as 1901 based on the 1901 Sanborn Map (Q10_Sanborn Maps-Southern.pdf) attached in response to Question 10. • The Station F power plant had three steam-engine-driven, 500 V, direct-current (DC) generators and one 400 kW, 2,300 V, 60-cycle steam-engine-driven unit that were remotely connected to a 500 V railway motor generator set in the Piedmont Barns of the railway company. • In 1908, power generation became intermittent. • In 1911, power generation ceased. • The Station F power plant was removed from Parcel D sometime between 1911 and 1924 based on its absence from the 1924 Sanborn Map (Q10_Sanborn Maps-Southern.pdf) attached in response to Question 10. <u>Station L Power Plant and Ancillary Facilities/Operations</u> PGE operated the Station L Power Plant, a steam-powered electricity generating plant, from approximately 1911 to 1975. PGE also operated several ancillary facilities associated with the Station L Power Plant. To the best of PGE's knowledge, after reasonable inquiry, the following	See Question 4 Attachments Q04_2006 Plats.pdf Q04_Plats.pdf Also see Question 10 Attachments Q10_Sanborn Maps-Northern.pdf Q10_Sanborn Maps-Southern.pdf Also see all Question 15 Attachments Also see all Question 50 Attachments Also see all Question 62 Attachments

EPA Question	Response	Records/Information Available
	summarizes PGE's activities associated with the Station L Power Plant and ancillary facilities: Power Plant • The Station L power plant was built on the western portion of Parcel C, north of the Station F power plant, in 1910/1911 and was initially composed of a boiler room and a generator/turbine room. From 1911 to 1956, the Station L power plant was fueled by sawdust or wood chips (known as hog fuel) and oil fuel. • Sometime between 1924 and 1950, a power house extension and second boiler room were added to the Station L power plant. • From 1954 to 1964, operation of the power plant was intermittent. From 1957 to 1964, the power plant was fueled exclusively by oil fuel and natural gas. • In 1965, the Station L power plant was placed on "cold" standby. • In 1968, a capability test was performed on Station L. • In 1973, the power plant was operated for a 60-day power shortage, using natural gas as the fuel source. • In 1975, the Station L power plant was retired and power generation equipment was offered for sale. Ancillary Facilities & Operations • Hog Fuel Storage - An outdoor hog fuel storage pile was located on Parcels A and E from 1910/1911 to approximately 1956. It had a storage capacity of 50,000 units of hog fuel at 200 cubic feet per unit. • Lincoln Substation – Lincoln Substation, composed of a bank of three 3,667 kVA, three-phase transformers, was located adjacent to the eastern side of the Station L power plant. It stepped down a double-circuit, 57,100 V transmission line to a 11,000 V line, which ran to the Jefferson Substation and Urban Substation for distribution. • Railway operations were conducted on Parcels F, H, and I by PGE predecessor companies and/or sister company (PTC) prior to 1948. After PTC was sold in 1948, railway operations were conducted by PTC through an easement. • In approximately 1957, an oil tank farm was added to the southeast portion of Parcel H. Oil was piped to the 96,690-barrel above ground storage tank (AST) in the tank farm via pipelines from barges docked at the oil dock. The oil dock was located adjacent to the northwest portion of Parcel I. Although the Stephens Substation was originally purchased as part of Station L and was operated in conjunction with the Station L power plant and Lincoln Substation, it has been retained by PGE for continued use as a substation and is addressed in a separate 104(e) response. <u>Other PGE Facilities</u> PGE also operated other facilities at Station L through 1986 on Parcels A-H and through 2005 on Parcel I. To the best of PGE's knowledge, after reasonable inquiry, the other PGE facilities and associated activities included, but were not limited to:	

EPA Question	Response	Records/Information Available
	• Central Division Garage (also known as Market Street Garage) - Located in the northeastern area of Parcel A. It was used for maintenance and repair of PGE fleet vehicles from at least 1945 to 1986. It included a vehicle service shop area, spray booth, machine shop, 10-ton overhead traveling crane, tire repair and storage area, storeroom, offices, vehicle lifts, lunch room, locker, and restroom facilities. • Garage Fueling Station – Located on Parcel A, adjacent to the Central Division Garage. It was used for fueling fleet vehicles from at least 1945 to 1986. It included five gas pumps, a canopy with overhead lube rack, an attendant station, and eight fuel underground storage tanks (USTs). • Communication Center – Located in the northwest area of Parcel A. It was used as the base of operations for the PGE Communications Department from at least 1966 to 1986. It included office space, materials storage area, Department Records Center, washrooms, and a garage bay for working on the communications system of company vehicles. • Radio Shop, Microwave Tower, and Mobile Radio Building – Located in the northwestern portion of Parcel B. They were the center of the PGE Mobile Radio and Pager System and linked in the PGE Microwave System. The radio shop was used for repairing communications equipment, as a receiving point for communications materials, and for spare parts storage from at least 1966 to 1986. • Machine Shop – Located in the southern area of Parcel B. It was used as a repair/modification facility for PGE equipment from at least 1945 to 1986. • Welding Shop – Located in the northern area of Parcel C. It was used as a metal repair/modification facility for PGE equipment from at least 1950 to sometime prior to 1986. • Analytical Lab – Located in the southeast area of Parcel C. It was used as the temporary quarters for the PGE analytical lab from approximately 1974 to 1976. It was composed of two large, joined, mobile home-style structures. • Storage Buildings, Pole Storage Areas, Equipment and Material Staging Areas – Various locations at different times of PGE operations at Station L (through 1986 on Parcels A-H and through 2005 on Parcel I). After retirement of the power plant in 1975, PGE continued to use the Station L property for the other PGE facilities (i.e., central division garage, garage fueling system, communication center, radio shop, microwave tower, mobile radio building, and welding/machine shops), as well as for vehicle parking, equipment storage, pole storage, overhead wire storage, and equipment staging areas. After evaluating several alternatives for the future development of Station L, PGE decided to donate Parcels A through F to OMSI. Title for this portion of Station L passed from PGE to OMSI on 31 December 1986. Because PGE had stored electrical equipment containing PCBs in some areas of Station L, a contingency of the OMSI donation was that PGE retained the responsibility for cleaning up PCB contamination and for the removal of all asbestos containing materials (ACM) on the donated land. To fulfill this voluntary obligation, PGE embarked on an initial uplands investigation and cleanup	

EPA Question	Response	Records/Information Available
	program at Station L. River sediments contamination was not suspected at Station L prior to the initial uplands investigation. During the initial uplands investigation; however, it became apparent that the potential existed for PCB-contaminated oil to have migrated into the river, west of the turbine building. PGE sampled and analyzed the river water and sediment, and PCBs were detected in the sediment. PGE collected additional sediment samples to determine the extent of contamination and found that an approximately 80- by 120-foot area of sediment had PCB concentrations ranging from <1 to 286 ppm. Based on the nature and extent of PCB-contaminated sediment, it appeared that the PCBs came from the edge of the river next to the turbine building. A review of historical PGE records showed that a transformer on the west side of the turbine building failed in April 1971 and released askarel oil (>500 ppm PCBs). In 1987, PGE entered into the Voluntary Cleanup Program with the Oregon Department of Environmental Quality (DEQ). PGE began soil, sediment, surface water, and groundwater investigations under the cleanup program. In March 1988, PGE submitted a Remedial Action Plan (RAP) to Oregon DEQ for remediation of PCB-contaminated sediments next to the turbine building. Oregon DEQ requested that PGE enter into a consent order covering the entire Station L facility before PGE began its proposed remedial action. In August 1988, PGE entered into a three-phase consent order (DEQ No. ECSR-NWR-88-02) to identify the nature and extent of hazardous substances over the entire Station L property (Parcels A through I) and Stephens Substation (addressed in a separate 104(e) response). The first two phases dealt with the Willamette River sediment PCB contamination adjacent to the turbine building and the third phase consisted of an uplands investigation to identify the nature and extent of hazardous substance contamination (if any) of sediment, soils, groundwater, surface water, and structures. • Sediment adjacent to the turbine building was remediated to 1 ppm PCBs. The remaining sediment in the river (less than 1 ppm PCBs) was covered with a 6-foot thick cap of sand, gravel, and rip rap. A post-construction inspection was conducted in 1990. Under Phase I and Phase II consent order requirements, PGE completed the remediation of PCB-contaminated river sediments in 1990. In April 1991, the Oregon DEQ issued a certificate of completion indicating that PGE had met the Phase I and Phase II consent order requirements. CH2MHill, on behalf of PGE, conducted yearly inspections of the sediment cap from 1991 to 1994. The Oregon DEQ then approved an inspection schedule of every 5 years or after major flood events, whichever occurred first. • Four main Station L upland areas were identified as areas of concern: the main service road, storm drains, the turbine room-outside area, and the southeast uplands area (SEUA). The soil was remediated to 1 ppm PCBs. In addition, the majority of soil was also remediated for other chemicals to levels below background and/or less than regulatory screening levels. Since the groundwater beneath Parcel A had benzene, toluene, ethylbenzene, and xylene (BTEX) concentrations above applicable screening criteria, an air sparging remediation system was installed at Parcel A in 1994 to reduce the BTEX concentrations. The air sparging remediation was planned	

EPA Question	Response	Records/Information Available
	to continue until the groundwater concentrations were below screening criteria or the air sparging remediation system had reached its threshold of effectiveness. Under Phase III consent order requirements, PGE completed the remediation of the uplands portion of Station L and the investigation of groundwater in 1994. In September 1994, PGE received a final "no further action" ("NFA") for Station L in Oregon DEQ's Station L Phase III Record of Decision (ROD). The U.S. Environmental Protection Agency (USEPA) completed a Site Investigation of Station L in August 1994. Based on their site investigation and other pertinent information, the USEPA found it appropriate to refer to state authority for Station L and did not anticipate further investigation for Station L under the Federal Superfund Program. In 1995, PGE removed the dock and dolphins adjacent to Parcel I, including ACM dock steam piping, prior to selling this parcel to Oregon TV Inc. (KPTV) that same year. In 1996, the sediment cap was inspected by CH2MHill following a flood event. The sediment cap was also inspected in 2001 and 2006 by Bridgewater Group, on behalf of PGE. The Station L cap has remained stable and there is no evidence of erosion. The cap is planned for re-inspection in 2011. PGE continued to monitor the groundwater beneath Parcel A at varying intervals. Due to the decline of BTEX concentrations in groundwater beneath Parcel A and because the air sparging remediation system had reached its threshold of effectiveness, the air sparging remediation system was abandoned in January 1998, including the abandonment of the monitoring wells and process wells. In 2005, PGE donated the remaining Station L parcel (Parcel H) to OMSI. PGE's current and future activities at Station L are limited to the continued monitoring of the Station L sediment cap and distribution network maintenance, as needed. For further details on the distribution network, see the separate 104(e) response for Miscellaneous Spills, Distribution Network, and Submerged Cables. See the response and documents attached for Question 15, the response and documents attached for Question 50, the plats (Q04_2006 Plats.pdf and Q04_Plats.pdf) attached in response to Question 4, the Sanborn maps (Q10_Sanborn Maps-Northern.pdf and Q10_Sanborn Maps-Southern.pdf) attached in response to Question 10, and The History of Portland General Electric Company, 1889 – 1981 attached in response to Question 77, which is part of the Supplemental Submittal S1. Also see the response and documents attached for Question 62.	
6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property,		

EPA Question	Response	Records/Information Available
including:		
a. partners or joint ventures;	Not applicable. To the best of PGE's knowledge, after reasonable inquiry, no partners or joint ventures have exercised actual control or held significant authority to control activities at Station L during PGE's ownership.	
b. any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);	Environmental consultants that have designed and implemented environmental investigations and/or remediation efforts at Station L on behalf of PGE through 1994 include CH2MHill, Crowley Environmental, Dames & Moore, EMCON Inc, Hahn and Associates Inc (HAI), Hart Crowser Inc, Environmental Toxicology International Inc, Hazard Management Specialists (HMS) Environmental Inc, OMNI Environmental Services Inc (OMNI), REA Tech Management, SweetEdwards & Associates Inc, and Bridgewater Group. Construction/demolition/remediation contractors included Chempro Environmental Services Inc, Daly Engineering Company, Foundation Sciences Inc, Fred Devine Diving & Salvage Inc, Geotechnical Resources Inc, Hazcon Inc, Intermountain West Inc, Kerr Contractors Inc, Performance Abatement Services (PAS, with subcontractor Electrical Construction Inc), Riedel International Inc, SERA Architects PC, Spencer Environmental Services Inc, Stratus Corporation, and Swan Wooster Engineering Inc. In addition, SRH Environmental Management was an environmental consultant on behalf of Life Flight for the Helipad Area UST removal and soil remediation in 1990.	
c. any person subleasing land, equipment or space on the Property;	To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the persons/companies subleasing land, equipment, or space on the Station L property during PGE's ownership: • On 10 June 1957, PGE granted Screw Machine Product Company the right to continue storing material in a building located on portions of the newly acquired Parcels G, H, and I (a former sawmill building located on portions of SE 2nd Ave, SE Sherman St, and Block 29) until 1 December 1957; see the document (Q07_1957-06-10 Use Permit_PGE to SMP.pdf) attached in response to Question 7. Screw Machine Product Co. had originally obtained a temporary (no more than 2 years) revocable use permit from the City of Portland on 1 December 1955, which was revoked by the City of Portland on 31 March 1957 in preparation of the transfer of the property to PGE. • On 29 April 1963, PGE granted permission to Zidell Explorations Inc to moor two LST boats to the dolphins adjacent to Parcel I; see the document (Q07_1963-07-11 Zidell Moorage Permit.pdf) attached in response to Question 7. The term of the permit was initially 2 weeks. The permit was extended to 31 August 1963. • On 20 June 1968, PGE granted the J.I. Case Company permission to store tractors on part of Parcel C (south of the Stephen Substation). PGE terminated the land use permit effective 24 September 1969; see the document (Q07_1968-06-20 JI Case Permit.pdf) attached in response to Question 7. • On 1 March 1973, PGE granted Reed College a use agreement for the PGE dock	See Question 7 Attachments Q07_1957-06-10 Use Permit_PGE to SMP.pdf Q07_1963-07-11 Zidell Moorage Permit.pdf Q07_1968-06-20 JI Case Permit.pdf Q07_1973-03-01 Reed College Moorage Agmt.pdf Q07_1982_09-28 Reed College Moorage Agmt.pdf Q07_1985-09-01 Reed College Moorage Agreement.pdf Q07_1980-03-20 Burns' Fuel Storage Agreement.pdf Q07_1980-12-29 1980 Luka Permit.pdf Q07_1986-12-31 OMSI Donation 18.5 Acres.pdf

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	adjacent to Parcel G, allowing Reed College the right to moor a barge and float at the dock; see the document (Q07_1973-03-01 Reed College Moorage Agmt.pdf) attached in response to Question 7. Reed College renewed their lease in 1982 and in 1985; see the documents (Q07_1982_09-28 Reed College Moorage Agmt.pdf and Q07_1985-09-01 Reed College Moorage Agreement.pdf) attached in response to Question 7. This use agreement expired on 31 August 1986. To the best of PGE's knowledge, after reasonable inquiry, Reed College did not use the docks after the expiration of the lease. • On 20 March 1980, PGE granted Burns' Brothers a use agreement for the 90,000-barrel AST on Parcel H; see the document (Q07_1980-03-20 Burns' Fuel Storage Agreement.pdf) attached in response to Question 7. The agreement allowed Burns' Brothers to store No. 2 diesel fuel in the AST. The term of the lease was 6 months. To the best of PGE's knowledge, after reasonable inquiry, Burns' Brothers did not use the storage tank after the expiration of the lease. • On 23 April 1980, PGE granted LUKA Holding Company Inc a permit to moor a 250-foot long vessel at the dock adjacent to Parcel I; see the document (Q07_1980-12-29 1980 Luka Permit.pdf) attached in response to Question 7. The term of the permit was from 1 June 1980 to 31 August 1980. The permit was extended to 31 December 1980. • On 1 September 1983, PGE granted Emanuel Hospital a permit to use the Helipad in Parcel D for the purpose of landing and refueling the hospital's life flight helicopter; see Exhibit F in the document (Q07_1986-12-31 OMSI Donation 18.5 Acres.pdf) attached in response to Question 7. The term of the permit was 5 years.	
d. utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;	To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the utilities, pipelines, railroads, and any other person/company with activities and/or easements regarding the Station L property during PGE's ownership: • On 22 October 1953, PGE granted the PTC a 24-foot wide easement along the eastern edge of Parcels A and B for a roadway; see the document (Q07_1953-10-22 Easement_PGE to PTC.pdf) attached in response to Question 7. • On 19 February 1960, the City of Portland requested that PGE grant an easement for the old Stevens Slough Sewer across Parcel C. PGE granted the City of Portland permission to maintain the sewer but did not grant them an easement for the sewer line; see the document (Q07_1960-03-22 PGE to COP_Sewer.pdf) attached in response to Question 7. • On 25 May 1962, PGE granted Peter Kiewit Sons' Company, which was contracted by the State of Oregon to construct portions of the Marquam Bridge, a permit to use the PGE roadway through Parcels C, F, H and I to haul materials and supplies and transport employees to the construction site, to use an area of land (85 feet by 120	Question 6 Attachment Q06d_1967 PTCO Use of Sta L.pdf Q06d_1989 Stolte-PGE Unauthorized Excavation.pdf Also see Question 4 Attachments Q04_ Plats.pdf Q04_ 2006 Plats.pdf Also see Question 7 Attachments Q07_1953-10-22 Easement_PGE to PTC.pdf Q07_1960-03-22 PGE to COP_Sewer.pdf Q07_1962-05-25 Kiewit Road Permit & Figure.pdf Q07_1964-06-24 Elterich Road Use Permit.pdf Q07_1966-10-06 PGE Easement to ODOT.pdf Q07_1972-06-30 1972 NWNtl Pipeline Esmt.pdf Q07_1983-10-11 COP Cathodic Protection Permit.pdf Q07_1983-11-02 DOT Land Aquisition.pdf Q07_1983-12-02 DOT Easement.pdf

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	feet) south of the roadway and Stephens Substation within Parcel C for a parking area, and space on Parcel B (near the PGE Station L office) for maintaining an office trailer; see the document (Q07_1962-05-25 Kiewit Road Permit & Figure.pdf) attached in response to Question 7. • On 24 June 1964, PGE granted the Louis Elterich Company & Del Guzzi Inc, which was subcontracted by the American Bridge Division of the US Steel Corporation under contract by the State of Oregon to construct portions of the Marquam Bridge, a permit to use the PGE roadway through Parcels C, F, H and I to haul materials and supplies and transport employees to the construction site. It also allowed the use of an area of land in the northwest corner of Parcel C for a truck turn-around and the erection of temporary construction-related structures, and an area of land in the southwest corner of Parcel B for a parking area; see the document (Q07_1964-06-24 Elterich Road Use Permit.pdf) attached in response to Question 7. • On 27 October 1966, PGE granted the State of Oregon an easement on portions of Parcels A and B for the construction of an elevated highway (known as the "Marquam Bridge," "EastBank Freeway," and "Interstate-5"); see the document (Q07_1966-10-06 PGE Easement to ODOT.pdf) attached in response to Question 7. On 7 November 1985, PGE granted ODOT a permit of entry for access to Parcels A and B through 30 June 1987 in order for ODOT to widen the Marquam Bridge; see the documents (Q07_1986-03-13 DOT Entry Permit-Extension.pdf and Q07_1986-10-22 DOT Permit to Entry.pdf) attached in response to Question 7. On 29 December 1986, PGE granted the State of Oregon revised (expanded) easements to allow for the widening of the Marquam Bridge, including perpetual and temporary easements for the construction, operation, inspection, and continued maintenance of the highway; see the document (Q07_1986-12-29 Easement_PGE to ODOT.pdf) attached in response to Question 7. Also see Exhibits B, C, and D in the document (Q07_1986-12-31 OMSI Donation 18.5 Acres.pdf) and the associated documents (Q07_1987-02-09 Marquam Letter.pdf, Q07_1983-11-02 DOT Land Aquisition.pdf, Q07_1983-12-02 DOT Easement.pdf, Q07_1985-01-04 DOT Letter-Easement.pdf, and Q07_1986-12-21 OHD Marquam Easement Access.pdf) attached in response to Question 7. • On 30 June 1972, PGE granted Northwest Natural Gas Company an easement for a 20-inch natural gas pipeline and its apparatus on the submerged land (below the ordinary low water line) adjacent to Parcel I; see the document (Q07_1972-06-30 1972 NWNtl Pipeline Esmt.pdf) attached in response to Question 7. • On 11 October 1983, PGE granted the City of Portland a permit to install and a 5-foot easement to maintain a cathodic protection control wire for the Bull Run Right of Way within a 4-inch duct in PGE's underground subway duct system along the eastern edge of Parcels A and B; see the documents (Q07_1983-10-11 COP Cathodic Protection Permit.pdf and Q07_1984-08-07 COP Cathodic Protection Approval.pdf) attached in response to Question 7.	Q07_1984-08-07 COP Cathodic Protection Approval.pdf Q07_1985-01-04 DOT Letter-Easement.pdf Q07_1986-03-13 DOT Entry Permit-Extension.pdf Q07_1986-10-22 DOT Permit to Entry.pdf Q07_1986-12-21 OHD Marquam Easement Access.pdf Q07_1986-12-29 Easement_PGE to ODOT.pdf Q07_1986-12-31 OMSI Donation 18.5 Acres.pdf Q07_1987-02-09 Marquam Letter.pdf Q07_1987-05-06 PGE-OMSI Roadway Easement.pdf Q07_1993-02-23 Property Use for Photos.pdf Q07_1998-04-27 COP ROW Deed.pdf Also see Question 15 Attachment Q15_1984-01-27 SERA_Phase I.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf

EPA Question	Response	Records/Information Available
	• In conjunction with the Station L donation to OMSI (Parcels A through F), PGE and OMSI entered into an agreement for a common roadway easement (SE Water Ave) on 27 May 1987 to allow PGE to access to the Stephens Substation; see the document (Q07_1987-05-06 PGE-OMSI Roadway Easement.pdf) attached in response to Question 7. • On 1 March 1993, PGE granted Strode Eckert Photography the right to take photographs on PGE property (Parcels G, H, I, as well as Stephens Substation), presumably to take photographs of the new OMSI facility on Parcels A through F; see the document (Q07_1993-02-23 Property Use for Photos.pdf) attached in response to Question 7. The term of the lease was for three months, terminating on 1 June 1993. • On 27 April 1998, PGE conveyed the deed for the right-of-way (SE Water Ave) to the City of Portland for a public street; see the document (Q07_1998-04-27 COP ROW Deed.pdf) attached in response to Question 7. In addition, there were several encroachments and an unauthorized excavation at Station L. • The attached 1967 PGE internal memo (Q06d_1967 PTCO Use of Sta L.pdf) notes several encroachments on PGE's Station L property by the Portland Traction Company (PTC) or their contractors: o PTC's office parking lot rain drain line extended 21 feet onto Parcel C, connecting to a sewer line 6 feet west of Stephens Substation. o PTC stored ties, rails, misc steel, rails, crosses, frogs, and debris along the 57 kV distribution line at Station L (Parcels F, H, and I). o PTC parked box cars on the railroad spur at Station L (Parcels H and I) o From May to September 1966, PTC's contractor (AD Ford & Sons) used approximately 1 acre of Station L property for a construction dump area during the relocation of PTC's tracks, which was required for the Marquam Bridge pier construction. • The attached 1967 document (Q06d_1989 Stolte-PGE Unauthorized Excavation.pdf) contains PGE and Stolte Construction Inc (contractor for Oregon, Department of Transportation [ODOT]) letters concerning the unauthorized excavation of soil at Station L during the Marquam Bridge widening. Also see Appendix K in the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15 which also concerns this unauthorized excavation. Also see the documents (Q04_Plats.pdf and Q04_2006 Plats.pdf) attached in response to Question 4.	
e. major financiers and lenders;	Not applicable. None have been identified.	

EPA Question	Response	Records/Information Available
f. any person who exercised actual control over any activities or operations on the Property;	To the best of PGE's knowledge, after reasonable inquiry, PGE personnel (see the response to Question 6g and 6h), the consultants and contractors (see the response to Question 6b), lessees (see the response to Question 6c), and other persons/companies with permits/easements/use agreements (see the response to Question 6d) exercised actual control over activities or operations at Station L during PGE's ownership. In addition, the ODOT and its contractors/consultants exercised actual control over Marquam Bridge building/expansion activities at Station L during PGE's ownership. During PGE remedial activities at Station L (1986-1994), OMSI and its consultants/contractors exercised actual control over the Parcels that OMSI owned (Parcels A through F); see the attached OMSI correspondences. In addition, the following consultants performed activities or operations on the Property: • On behalf of PGE, CC Moore and Company furnished and installed the boilers at Station L and helped perform the inspection of and maintenance on the boilers in 1968 to facilitate a 1968 capacity test. • A Station L Property Master Plan was written for Station L in 1984, for which several contractors performed activities at Station L: SERA Architects PC (site and structure evaluations and documentation), Foundation Sciences Inc (soil and geotechnical engineering evaluations), and Swan Wooster Engineering Inc (utilities identification); see the documents (Q15_1984-01-27 SERA_Phase I.pdf and Q15_1984-04-00 SERA Prelim Geotech Eng Invst.pdf) attached in response to Question 15.	Question 6 Attachments Q06f_1987-09-25_OMSI to PGE_Re Asbestos.pdf Q06f_1988-01-08_PGE to OMSI_Re Asbestos Bidders.pdf Q06f_1988-01-11_HC to OMSI_Status Update.pdf Q06f_1988-03-04_ Parisi-OMSi_Consent Order.pdf Q06f_1988-04-15 PGE to OMSI harmless of cost.pdf Q06f_1988-05-16_PGE to OMSI_Asbestos Removal.pdf Q06f_1988-07-22_DEQ to OMSI_PCB Cleanup.pdf Q06f_1989-09-27_OMSI Permission - UST-01.pdf Q06f_1990-07-11_PGE to OMSI_Re Decom USTs.pdf Q06f_1990-11-02_DEQ to OMSI_New OMSI Site.pdf Q06f_1991-06-19 PGE to OMSI_Re Envir Questions.pdf Q06f_1991-10-10_DEQ to Parisi-OMSI_Status Rpt.pdf Q06f_1995-01-25 PGE to OMSI_Pier debris.pdf Also see Question 15 Attachments Q15_1984-01-27 SERA_Phase I.pdf Q15_1984-04-00 SERA Prelim Geotech Eng Invst.pdf
g. any person who held significant authority to control any activities or operations on the Property;	Multiple individuals have had authority within PGE to access and conduct activities at Station L. Many are listed on the following documents: • Bullseye articles 1956, 1957, 1958, 1959, 1960, 1961, 1963, 1967, 1971, 1973 and 1980. • Organizational charts for the years: 1980, 1982, 1984, 1986, 1988, 1989, 1990, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, and 2005 • Distribution and System Planning information 1956-2005. • Management structure information 1982-2005. In addition, the persons/companies described in responses to Questions 6b, 6c, 6d, and 6f had the authority to access and conduct activities during PGE's ownership and/or remedial activities at Station L.	Question 6 Attachments Q06g_Bullseye Articles.pdf Q06g_Distribution and System Planning Information.pdf Q06g_HRIS Structure Info 1982-2005.pdf Q06g_Organizational Charts.pdf
h. any person who had a significant presence or who conducted significant activities at the Property; and	Multiple individuals have had authority within PGE to access and conduct activities at Station L. Many are listed on documents attached in response to Question 6g: • Bullseye articles 1956, 1957, 1958, 1959, 1960, 1961, 1963, 1967, 1971, 1973 and 1980. • Organizational charts for the years: 1980, 1982, 1984, 1986, 1988, 1989, 1990, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, and 2005 • Distribution and System Planning information 1956-2005. • Management structure information 1982-2005.	

EPA Question	Response	Records/Information Available
	In addition, the persons/companies described in responses to Questions 6b, 6c, 6d, and 6f had the authority to access and conduct activities during PGE's ownership and/or remedial activities at Station L.	
i. government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.	To the best of PGE's knowledge, after reasonable inquiry, the City of Portland and the State of Oregon (Department of Transportation and the DSL) had proprietary interests or involvement with regard to Station L, which are summarized below: • The City of Portland for the conveyance of the portions of the vacated streets within Station L to PGE in 1955/1957; see the response and documents (Q07_1955 COP Ord 102168.pdf, Q07_1955 COP Ord 102169.pdf, Q07_1955-04-18 COP Resolution 26491.pdf, Q07_1955-04-18 COP Resolution 26492.pdf, Q07_1955-01-24 Petition to COP for Vacation.pdf, Q07_1957 COP Ord 106070.pdf, Q07_1957-03-28 COP Resolution 27242.pdf, and Q07_1957-05-22 COP Street Vacation Ord 105941.pdf) attached for Question 7. • The City of Portland for permission to maintain the old Stevens Slough Sewer across Parcel C in 1960; see the response and document (Q07_1960-03-22 PGE to COP_Sewer.pdf) attached for Question 7. • The State of Oregon, Department of Transportation for the 1966 and 1980s easements on Parcels A and B that PGE granted for the construction, operation, maintenance, and expansion of the Marquam Bridge; see the response and documents (Q07_1966-10-06 PGE Easement to ODOT.pdf, Q07_1986-12-29 Easement_PGE to ODOT.pdf, Q07_1987-02-09 Marquam Letter.pdf, Q07_1983-11-02 DOT Land Aquisition.pdf, Q07_1983-12-02 DOT Easement.pdf, Q07_1985-01-04 DOT Letter-Easement.pdf, Q07_1986-03-13 DOT Entry Permit-Extension.pdf, Q07_1986-10-22 DOT Permit to Entry.pdf, and Q07_1986-12-21 OHD Marquam Easement Access.pdf) attached for Question 7. Also see Exhibits B, C, and D in the document (Q07_1986-12-31 OMSI Donation 18.5 Acres.pdf) attached in response to Question 7. • The City of Portland for the easement that PGE granted for the installation and maintenance of a cathodic protection control wire for the Bull Run Right of Way along the eastern edge of Parcels A and B in 1983/1984; see the response and documents (Q07_1983-10-11 COP Cathodic Protection Permit.pdf and Q07_1984-08-07 COP Cathodic Protection Approval.pdf) attached for Question 7. • The City of Portland when Parcel G was released back to the City of Portland at the time PGE and OMSI entered into an agreement for a common roadway easement (SE Water Ave) in 1987; see the response and document (Q07_1987-05-06 PGE-OMSI Roadway Easement.pdf) attached for Question 7. • The City of Portland when the City established the Willamette Greenway along the eastern shore of the Willamette River in 1986/1988, extending into the northern portion of Station L through several ordinances and permits; see the response and	See Question 7 Attachments Q07_1955 COP Ord 102168.pdf Q07_1955 COP Ord 102169.pdf Q07_1955-04-18 COP Resolution 26491.pdf Q07_1955-04-18 COP Resolution 26492.pdf Q07_1955-01-24 Petition to COP for Vacation.pdf Q07_1957 COP Ord 106070.pdf Q07_1957-03-28 COP Resolution 27242.pdf Q07_1957-05-22 COP Street Vacation Ord 105941.pdf Q07_1960-03-22 PGE to COP_Sewer.pdf Q07_1966-10-06 PGE Easement to ODOT.pdf Q07_1986-12-29 Easement_PGE to ODOT.pdf Q07_1987-02-09 Marquam Letter.pdf Q07_1983-11-02 DOT Land Aquisition.pdf Q07_1983-12-02 DOT Easement.pdf Q07_1985-01-04 DOT Letter-Easement.pdf Q07_1986-03-13 DOT Entry Permit-Extension.pdf Q07_1986-10-22 DOT Permit to Entry.pdf Q07_1986-12-21 OHD Marquam Easement Access.pdf Q07_1986-12-31 OMSI Donation 18.5 Acres.pdf Q07_1983-10-11 COP Cathodic Protection Permit.pdf Q07_1984-08-07 COP Cathodic Protection Approval.pdf Q07_1987-05-06 PGE-OMSI Roadway Easement.pdf Q07_1979-10-03 COP Willamette Greenway Ord.pdf Q07_1986-11-12 COP Con Use Greenway Permit.pdf Q07_1988-01-22 COP Greenway Ord 160422.pdf Q07_1998-04-27 COP ROW Deed.pdf Q07_1990-05-01 DSL Ownership Investigation.pdf Q07_1990-08-15 DSL QuitClaim Deeds.pdf Q07_1988-07-07 OMSI State Claim.pdf Q07_1988-11-15 OMSI Conveyance of Title.pdf Q07_1988-12-15 PGE Legal to Parisi_OMSI Property.pdf

EPA Question	Response	Records/Information Available
	documents (Q07_1979-10-03 COP Willamette Greenway Ord.pdf, Q07_1986-11-12 COP Con Use Greenway Permit.pdf, and Q07_1988-01-22 COP Greenway Ord 160422.pdf) attached for Question 7. • The City of Portland when the City was deeded the right-of-way (SE Water Ave) for a public street by PGE in 1998; see the response and document (Q07_1998-04-27 COP ROW Deed.pdf) attached for Question 7. • The DSL for the release of all claim for the previously submerged lands on Parcel I lying above the ordinary low water line as it existed in 1990; see the response and documents (Q07_1990-08-15 DSL QuitClaim Deeds.pdf and Q07_1990-05-01 DSL Ownership Investigation.pdf) attached for Question 7. • The DSL for the lands lying below the line of ordinary low water as it existed in 1990. PGE released any claim it may have had to the submerged lands adjacent to Parcel I in 1990; see the response and documents (Q07_1990-08-15 DSL QuitClaim Deeds.pdf, Q07_1988-07-07 OMSI State Claim.pdf, Q07_1988-11-15 OMSI Conveyance of Title.pdf, and Q07_1988-12-15 PGE Legal to Parisi_OMSI Property.pdf) attached for Question 7.	
7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest: when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.). Also provide all information and documentation regarding, but not limited to the following:	The documents (Q04_2006 Plats.pdf and Q04_Plats.pdf) attached in response to Question 4 indicate when and from whom Station L was purchased by PGE or a PGE predecessor company (i.e., OWPR, PRLP, CSRC, or PNPS) and to whom interests in the Station L parcels were conveyed. To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the legal or equitable interest that PGE acquired or conveyed at Station L: <u>Purchase/Sale Agreements</u> To the best of PGE's knowledge, after reasonable inquiry, the following is a summary of PGE's acquisition (purchase) and conveyance (sale) of the Station L parcels: <u>Acquisitions</u> • Parcels A and C Acquisition – Parcels A and C were purchased by PGE (as predecessor company OWPR) on 25 March 1905 from The Land Company of Oregon. • Parcel B Acquisition – Parcel B was leased by PGE (as predecessor company OWPR) from 1904 to 1937. The parcel was originally leased by Fred S Morris on 28 February 1902 from the Stephens Land Co for a term of 30 years; however, the lease was assumed by PGE (as predecessor company OWPR) on 23 November 1904. On 4 June 1937, PGE (as predecessor company PNPS) purchased Parcel B from HJ and Mable Wallace. • Parcel D Acquisition – Parcel D was purchased by PGE (as predecessor company CSRC) on 30 September 1902 from the Ladd Estate.	Question 7 Attachments <u>Deeds, Sale Agreements, and Associated Documents</u> Q07_1954-12-30 Conveyance of Rights.pdf Q07_1954-12-31 Deed_GP to PGE.pdf Q07_1955 COP Ord 102169.pdf Q07_1955 COP Ord 102168.pdf Q07_1955-01-24 Petition to COP for Vacation.pdf Q07_1957-03-28 COP Resolution 27242.pdf Q07_1955-04-18 COP Resolution 26491.pdf Q07_1955-04-18 COP Resolution 26492.pdf Q07_1955-07-01 Deeds_GP to PGE.pdf Q07_1957 COP Ord 106070.pdf Q07_1957-05-22 COP Street Vacation Ord 105941.pdf Q07_1986-04-16 1986 CWDC.pdf Q07_1986-12-02 PGE to PUC.pdf Q07_1986-12-22 Donation to OMSI-Amended Order.pdf Q07_1986-12-31 OMSI Donation 18.5 Acres.pdf Q07_1987-02-09 Marquam Letter.pdf Q07_1986-12-31 OMSI_Donation and Accpt Agreement.pdf Q07_1988-07-07 OMSI State Claim.pdf Q07_1988-11-15 OMSI Conveyance of Title.pdf Q07_1988-12-15 PGE Legal to Parisi_OMSI

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	• Parcel E Acquisition – Parcel E was acquired through the following transactions: o On 31 December 1954, PGE acquired Lots 27 and 34, as well as the interest in the northern half of SE Lincoln St from the Georgia Pacific Plywood Company; see the attached documents (Q07_1954-12-30 Conveyance of Rights.pdf and Q07_1954-12-31 Deed_GP to PGE.pdf). o On 1 June 1955, the City of Portland conveyed its interest in the vacated portion of SE Lincoln St (southern half), SE First Ave, and SE Second Ave to PGE through Ordinance 102169; see the attached document (Q07_1955 COP Ord 102169.pdf). Also see the attached associated documents (Q07_1955-04-18 COP Resolution 26492.pdf and Q07_1955-01-24 Petition to COP for Vacation.pdf). • Parcel F Acquisition – Parcel F was acquired through the following transactions: o On 14 December 1909, the northeast corner of Block 34, the western portion of Block 47, and the northern half of SE Lincoln St within Parcel F was purchased by PGE (as predecessor company PRLP) from Inman-Poulsen Lumber Co. o To the best of PGE's knowledge, after reasonable inquiry and based on the City of Portland Auditor's Office information available online, the City of Portland conveyed its interest in the vacated portion of SE Third Ave to PGE through Ordinance 123419 in October 1966. o On 1 June 1955, the City of Portland conveyed its interest in the vacated portion of SE Lincoln St (southern half) to PGE through Ordinance 102169; see the attached document (Q07_1955 COP Ord 102169.pdf). Also see the attached associated documents (Q07_1955-04-18 COP Resolution 26492.pdf and Q07_1955-01-24 Petition to COP for Vacation.pdf). • Parcel G Acquisition – Parcel G (historically SE Second Ave, renamed SE Water Ave) was acquired through the following transactions: o On 1 July 1955, PGE purchased the vacated portion of SE Second Ave (which was previously vacated under Ordinance 102168) from the Georgia Pacific Plywood Company; see the attached documents (Q07_1955-07-01 Deeds_GP to PGE.pdf and Q07_1955 COP Ord 102168.pdf). Also see the attached associated City of Portland Resolutions 26491 and 26492 (Q07_1955-04-18 COP Resolution 26491.pdf and Q07_1955-04-18 COP Resolution 26492.pdf). o On 17 May 1957, the City of Portland conveyed its interest in the vacated portion of SE Second Ave to PGE through Ordinance 105941, amended by Ordinance 106070; see the attached documents (Q07_1957-05-22 COP Street Vacation Ord 105941.pdf and Q07_1957 COP Ord 106070.pdf). Also see the attached associated City of Portland Resolution 27242 (Q07_1957-03-28 COP Resolution 27242.pdf). • Parcel H Acquisition – Parcel H was acquired through the following transactions: o On 14 December 1909, PGE purchased the 0.07 acres of land in the northeast	Property.pdf Q07_1990-08-15 DSL QuitClaim Deeds.pdf Q07_1990-05-01 DSL Ownership Investigation.pdf Q07_1994-07-19 KPTV Purchase Agreement.pdf Q07_1995-05-18 KPTV Purchase Agreement.pdf Q07_1995-06-15 KPTV Subdvn Agreement.pdf Q07_1995-07-07 KPTV Land History Documents.pdf Q07_1995-07-10 KPTV Supplemental Title Report.pdf Q07_1995-07-14 KPTV Buyer Stmt.pdf Q07_1995-07-14 PGE to KPTV SWD.pdf Q07_2003-10-29 OMSI Otpn.pdf Q07_2003-12-12 OMSI Optn.pdf Q07_2004-05-20 OMSI Optn Amend.pdf Q07_2005-12-30 OMSI Deed Lots 3&4.pdf Q07_2005-12-30 Partial Esmt Rlse.pdf <u>Leases, Use Agreements, Easements to PGE</u> Q07_1933-11-16 PNWP Esmt.pdf Q07_1959-02-04 COP Ord Fill Permit 109429.pdf Q07_1986-12-31 OMSI Lease Agreement.pdf Q07_1986 Easement Electric Transmission Line.pdf Q07_1986 Easement Underground Powerline.pdf Q07_1988-06-22 PGE-OMSI Lease Terms.pdf Q07_1987-05-06 PGE-OMSI Roadway Easement.pdf Q07_1992-05-29 1992 OMSI Esmt.pdf Q07_1995-07-07 KPTV to PGE Easement.pdf Q07_2005-12-29 OMSI Lease Lot 3.pdf Q07_2005-12-29 OMSI Esmt.pdf Q07_Easements Retained.pdf Q07_2006-02-01 OMSI Parking Lease.pdf <u>Leases, Use Agreements, Easements by PGE</u> Q07_1953-10-22 Easement_PGE to PTC.pdf Q07_1957-06-10 Use Permit_PGE to SMP.pdf Q07_1960-03-22 PGE to COP_Sewer.pdf Q07_1962-05-25 Kiewit Road Permit & Figure.pdf Q07_1963-07-11 Zidell Moorage Permit.pdf Q07_1964-06-24 Elterich Road Use Permit.pdf Q07_1966-10-06 PGE Easement to ODOT.pdf Q07_1968-06-20 JI Case Permit.pdf Q07_1972-06-30 1972 NWNtl Pipeline Esmt.pdf Q07_1973-03-01 Reed College Moorage Agmt.pdf Q07_1980-03-20 Burns' Fuel Storage Agreement.pdf Q07_1980-12-29 1980 Luka Permit.pdf

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	portion of Parcel H (identified as 'A' within Parcel H) from Inman-Poulsen Lumber Company. o On 1 July 1955, Georgia Pacific Plywood Company conveyed a 4 foot by 17.5 foot irregular portion of Block 49 (identified as 'D' within Parcel H), as well as its interest in Blocks 29, 32, and 49 and in vacated portions of SE Sherman St and SE Third Ave, to PGE; see the attached document (Q07_1955-07-01 Deeds_GP to PGE.pdf). o On 17 May 1957, the City of Portland conveyed its interest in Blocks 29 (eastern portion), 32, and 49 (western portion) and the vacated portion of SE Third Ave within Parcel H to PGE through Ordinance 105941, amended by Ordinance 106070; see the attached documents (Q07_1957-05-22 COP Street Vacation Ord 105941.pdf and Q07_1957 COP Ord 106070.pdf). Also see the attached associated City of Portland Resolution 27242 (Q07_1957-03-28 COP Resolution 27242.pdf). • Parcel I Acquisition – Parcel I was acquired through the following transactions: o On 14 December 1909, PGE purchased the 0.50 acres of land in the northeast portion of Parcel I (identified as 'A' within Parcel I) from Inman-Poulsen Lumber Company. o On 1 June 1955, the City of Portland conveyed its interest in the vacated portion of SE Grant St to PGE through Ordinance 102168; see the attached document (Q07_1955 COP Ord 102168.pdf). Also see the attached associated City of Portland Resolutions 26491 and 26492 (Q07_1955-04-18 COP Resolution 26491.pdf and Q07_1955-04-18 COP Resolution 26492.pdf). o On 1 July 1955, Georgia Pacific Plywood Company conveyed Blocks 13, 28, 33, and 48 (western portion) and the vacated portions of SE Sherman St, SE First Ave, and SE Third Ave (which were previously vacated under Ordinance 102168 and Ordinance 105941, amended by Ordinance 106070) to PGE. In addition, Georgia Pacific Plywood Company also conveyed its interest in the western portion of Block 29 within Parcel I to PGE. See the attached documents (Q07_1955-07-01 Deeds_GP to PGE.pdf, Q07_1955 COP Ord 102168.pdf, Q07_1957-05-22 COP Street Vacation Ord 105941.pdf, and Q07_1957 COP Ord 106070.pdf). Also see the attached associated City of Portland Resolutions 26491, 26492, and 27242 (Q07_1955-04-18 COP Resolution 26491.pdf, Q07_1955-04-18 COP Resolution 26492.pdf, and Q07_1957-03-28 COP Resolution 27242.pdf). o On 17 May 1957, the City of Portland conveyed its interest in the western portion of Block 29 to PGE through Ordinance 105941, amended by Ordinance 106070; see the attached documents (Q07_1957-05-22 COP Street Vacation Ord 105941.pdf and Q07_1957 COP Ord 106070.pdf). Also see the attached associated City of Portland Resolution 27242 (Q07_1957-03-28 COP Resolution 27242.pdf). o On 29 August 1990, the DSL issued PGE a quitclaim deed on the previously submerged lands lying above the ordinary low water line as it existed in 1990	Q07_1982_09-28 Reed College Moorage Agmt.pdf Q07_1983-10-11 COP Cathodic Protection Permit.pdf Q07_1983-11-02 DOT Land Aquisition.pdf Q07_1983-12-02 DOT Easement.pdf Q07_1984-08-07 COP Cathodic Protection Approval.pdf Q07_1985-01-04 DOT Letter-Easement.pdf Q07_1985-09-01 Reed College Moorage Agreement.pdf Q07_1986-03-13 DOT Entry Permit-Extension.pdf Q07_1986-10-22 DOT Permit to Entry.pdf Q07_1986-12-21 OHD Marquam Easement Access.pdf Q07_1986-12-29 Easement_PGE to ODOT.pdf Q07_1993-02-23 Property Use for Photos.pdf Q07_1998-04-27 COP ROW Deed.pdf Q07_2000-02-25 Monument Affidavit.pdf <u>Other Legal/Equitable Documents</u> Q07_1957-07-11 GPC Steel Rail.pdf Q07_1957-09-26 Stor.Tank Permit COP Ord 106699.pdf Q07_1957-10-09 COP Street Vacation Ord 106759.pdf Q07_1979-10-03 COP Willamette Greenway Ord.pdf Q07_1986-11-12 COP Con Use Greenway Permit.pdf Q07_1988-01-22 COP Greenway Ord 160422.pdf Q07_1992-05-18 SPTC ROE Permit.pdf Also see Question 4 Attachments Q04_Plats.pdf Q04_2006 Plats.pdf

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	(identified as 'L' within Parcel I), thereby relinguishing any claim the state may have had; see the attached document (Q07_1990-08-15 DSL QuitClaim Deeds.pdf). Also see the attached associated ownership investigation document (Q07_1990-05-01 DSL Ownership Investigation.pdf). <u>Conveyances</u> • Parcels A through F Conveyance – Parcels A through F were sold to OMSI on 31 December 31 1986; see the attached documents (Q07_1986-12-31 OMSI Donation 18.5 Acres.pdf and Q07_1986-12-31 OMSI_Donation and Accpt Agreement.pdf). Also see the attached documents (Q07_1986-12-02 PGE to PUC.pdf, Q07_1986-12-22 Donation to OMSI-Amended Order.pdf, and Q07_1986-04-16 1986 CWDC.pdf) relating to the Public Utility Commission's authorization of the Station L donation (Parcels A through F) to OMSI. • Parcel G Conveyance – Parcel G was released back to the City of Portland when PGE and OMSI entered into an agreement for a common roadway easement (SE Water Ave) on 27 May 1987 in order for PGE to maintain access to the Stephens Substation; see the attached document (Q07_1987-05-06 PGE-OMSI Roadway Easement.pdf). • On 15 August 1990, PGE issued a quitclaim deed to the DSL for the lands lying below the line of ordinary low water as it existed in 1990 (identified as 'M' adjacent to Parcel I), thereby relinguishing any claim PGE may have had; see the attached document (Q07_1990-08-15 DSL QuitClaim Deeds.pdf). Also see the attached associated ownership investigation document (Q07_1990-05-01 DSL Ownership Investigation.pdf), as well as the attached documents (Q07_1988-07-07 OMSI State Claim.pdf, Q07_1988-11-15 OMSI Conveyance of Title.pdf, and Q07_1988-12-15 PGE Legal to Parisi_OMSI Property.pdf) relating to PGE's, OMSI's, and the state's claim to the submerged land below the ordinary low water line adjacent to Parcels A through E, which PGE donated to OMSI in December 1986. • Parcel H Conveyance – Parcel H was sold to Oregon Television Inc (KPTV) on 14 July 1995; see the attached deed (Q07_1995-07-14 PGE to KPTV SWD.pdf). Also see the attached associated sale agreements and documents (Q07_1994-07-19 KPTV Purchase Agreement.pdf, Q07_1995-05-18 KPTV Purchase Agreement.pdf, Q07_1995-06-15 KPTV Subdvn Agreement.pdf, Q07_1995-07-07 KPTV Land History Documents.pdf, Q07_1995-07-10 KPTV Supplemental Title Report.pdf, and Q07_1995-07-14 KPTV Buyer Stmt.pdf). Also see the attached document (Q07_2000-02-25 Monument Affidavit.pdf), which provides the monument survey conducted in July 1995 in preparation of selling Parcel H. • Parcel I Conveyance – Parcel I was sold to OMSI on 30 December 2005; see the attached deed (Q07_2005-12-30 OMSI Deed Lots 3&4.pdf). Also see the attached associated documents (Q07_2003-10-29 OMSI Otpn.pdf, Q07_2003-12-12 OMSI Optn.pdf, and Q07_2004-05-20 OMSI Optn Amend.pdf). On 30 December 2005, PGE	

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	issued a partial release for the rail easement on Parcel I, which is identified as item "G" on the plat (Q04_2006 Plats.pdf) attached in response to Question 4, thereby surrendering, disclaiming, renouncing, and abandoning all rights, titles, and interest in and to the railway easement on Parcel I; see the attached document (Q07_2005-12-30 Partial Esmt Rlse.pdf). <u>Leases/ Easements Acquired by PGE</u> To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the leases and easements PGE had/has at Station L: • On 16 September 1931, PGE leased 7,240 square feet in Block 47 which is adjacent to Parcel F, and 500 square feet in Block 48 which is adjacent to Parcel I on a monthly basis starting on 16 September 1931. PEPCO (a PGE predecessor company) sold these parcels to the Southern Pacific Co in 1928 (prior to the investigation period). To the best of PGE's knowledge, after reasonable inquiry, PGE does not know when PGE ceased leasing the property; however, it likely ceased by at least 1975 when the Station L power plant was retired. • PNPS (a PGE predecessor company, which became PEPCO) retained perpetual easements for the railway lines that it deeded to PGE in 1930, including on Parcels F, H, and I addressed in this response (portions of Blocks 34, 47, 48, and 49 with railroad tracks); see the attached document (Q07_1933-11-16 PNWP Esmt.pdf). To the best of PGE's knowledge, after reasonably inquiry, these railway line easements were transferred to PTC (PGE's sister company) in approximately 1933 and retained by PTC when it was sold in 1948. PTC is no longer affiliated with PGE. • On 17 September 1941 (prior to PGE purchasing the property), PGE was granted an easement for the installation and maintenance of a steel transmission line tower in Block 49 of Parcel H; see the attached document (Q07_1986-12-31 OMSI Lease Agreement.pdf). • On 4 February 1959, PGE was granted permission through City of Portland Ordinance 109429 to place permanent fill over the Bull Run Right-of-Way (a 24-inch city water line) between Parcels B and C, rather than replacing the Station L access trestle that crossed the right-of-way and was in poor condition; see the attached document (Q07_1959-02-04 COP Ord Fill Permit 109429.pdf). • On 31 December 1986, PGE leased Parcels A through F from OMSI, the same date that PGE donated these parcels to OMSI. The term of the lease was from 31 December 1986 until 30 June 1988; see the attached documents (Q07_1986-12-31 OMSI Lease Agreement.pdf, Q07_1988-06-22 PGE-OMSI Lease Terms.pdf, and Q07_1986-12-31 OMSI_Donation and Accpt Agrmnt.pdf). The lease was extended though 15 November 1988 for Parcel A. The lease was granted to enable PGE to conduct remediation activities on these parcels as specified by the donation	

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	contingency. • In conjunction with the Station L donation to OMSI (Parcels A through F), OMSI granted PGE electric transmission, distribution, and underground power line easements on Parcels A, B, C, E, and F on 31 December 1986; see the attached documents (Q07_1986 Easement Electric Transmission Line.pdf and Q07_1986 Easement Underground Powerline.pdf). • In conjunction with the Station L donation to OMSI (Parcels A through F), PGE and OMSI entered into an agreement for a common roadway easement (SE Water Ave) on 27 May 1987 to allow PGE to access to the Stephens Substation; see the attached document (Q07_1987-05-06 PGE-OMSI Roadway Easement.pdf). • On 11 June 1992, OMSI granted PGE a Stephens Substation easement and building foundation & roof drain leader easement on Parcel C of Station L; see the attached document (Q07_1992-05-29 1992 OMSI Esmt.pdf). The location of these easements is indicated with an "X" in the document (Q4a_2006 Plat.pdf) attached in response to Question 4a. • On 7 July 1995, Oregon Television Inc (KPTV) granted PGE an electric power line easement for the continued maintenance and operation of the electric power lines and signal communication lines on the eastern side of Parcel H. PGE previously sold this parcel to Oregon Television Inc (KPTV). See the attached document (Q07_1995-07-07 KPTV to PGE Easement.pdf). • On 30 December 2005, PGE leased the western lot (Lot 3) of Parcel I for one month, from 29 December 2005 through 31 January 2006. See the attached documents (Q07_2005-12-30 OMSI Deed Lots 3&4.pdf and Q07_2005-12-29 OMSI Lease Lot 3.pdf). PGE previously donated this land to OMSI and this lease was granted to allow PGE to enough time to remove its equipment from the parcel after the donation. • On 29 December 2005, OMSI granted PGE an electric power line easement for the continued maintenance and operation of the electric power lines and signal communication lines on the eastern side of Parcel I. PGE previously donated this parcel to OMSI; see the attached document (Q07_2005-12-29 OMSI Esmt.pdf). • PGE currently leases 20 motor vehicle parking spaces from OMSI for use by PGE employees, agents, and contractors; see the attached document (Q07_2006-02-01 OMSI Parking Lease.pdf). The parking spaces are located within Parcel A on the northernmost end of OMSI's parking lot. The lease term is from 1 February 2006 until 21 January 2011. • The attached document (Q07_Easements Retained.pdf) summarizes the ingress/egress, overhead, and underground electric transmission and distribution line	

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	easements that PGE has retained on Station L. <u>Leases/Use Agreements/Easements Conveyed by PGE</u> To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the leases/subleases, use agreements, and easements PGE conveyed to persons/companies during PGE's historical Station L ownership: • On 22 October 1953, PGE granted the PTC a 24-foot wide easement along the eastern edge of Parcels A and B for a roadway; see the attached document (Q07_1953-10-22 Easement_PGE to PTC.pdf). • On 10 June 1957, PGE granted Screw Machine Product Company the right to continue storing material in a building located on portions of the newly acquired Parcels G, H, and I (a former sawmill building located on portions of SE 2nd Ave, SE Sherman St, and Block 29) until 1 December 1957; see the attached document (Q07_1957-06-10 Use Permit_PGE to SMP.pdf). Screw Machine Product Co had originally obtained a temporary (no more than 2 years) revocable use permit from the City of Portland on 1 December 1955, which was revoked by the City of Portland on 31 March 1957 in preparation of the transfer of the property to PGE. • On 19 February 1960, the City of Portland requested that PGE grant an easement for the old Stevens Slough Sewer across Parcel C. PGE granted the City of Portland permission to maintain the sewer but did not grant an easement for the sewer line; see the attached document (Q07_1960-03-22 PGE to COP_Sewer.pdf). • On 25 May 1962, PGE granted Peter Kiewit Sons' Company, which was contracted by the State of Oregon to construct portions of the Marquam Bridge, a permit to use the PGE roadway through Parcels C, F, H and I to haul materials and supplies and transport employees to the construction site, to use an area of land (85 feet by 120 feet) south of the roadway and Stephens Substation within Parcel C for a parking area, and space on Parcel B (near the PGE Station L office) for maintaining an office trailer; see the attached document (Q07_1962-05-25 Kiewit Road Permit & Figure.pdf). • On 29 April 1963, PGE granted permission to Zidell Explorations Inc to moor two LST boats to the dolphins adjacent to Parcel I; see the attached document (Q07_1963-07-11 Zidell Moorage Permit.pdf). The term of the permit was initially 2 weeks. The permit was extended to 31 August 1963. • On 24 June 1964, PGE granted the Louis Elterich Company & Del Guzzi Inc, which was subcontracted by the American Bridge Division of the US Steel Corporation under contract by the State of Oregon to construct portions of the Marquam Bridge, a permit to use the PGE roadway through Parcels C, F, H and I to haul materials and supplies and transport employees to the construction site, to use an area of land in	

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	the northwest corner of Parcel C for a truck turn-around and the erection of temporary construction-related structures, and an area of land in the southwest corner of Parcel B for a parking area; see the attached document (Q07_1964-06-24 Elterich Road Use Permit.pdf). • On 27 October 1966, PGE granted the State of Oregon an easement on portions of Parcels A and B for the construction of an elevated highway (known as the "Marquam Bridge," "EastBank Freeway," and "Interstate-5"); see the attached document (Q07_1966-10-06 PGE Easement to ODOT.pdf). On 7 November 1985, PGE granted ODOT a permit of entry for access to Parcels A and B through 30 June 1987 in order for ODOT to widen the Marquam Bridge; see the attached documents (Q07_1986-03-13 DOT Entry Permit-Extension.pdf and Q07_1986-10-22 DOT Permit to Entry.pdf). On 29 December 1986, PGE granted the State of Oregon revised (expanded) easements to allow for the widening of the Marquam Bridge, including perpetual and temporary easements for the construction, operation, inspection, and continued maintenance of the highway; see the attached document (Q07_1986-12-29 Easement_PGE to ODOT.pdf). Also see Exhibits B, C, and D in the attached document (Q07_1986-12-31 OMSI Donation 18.5 Acres.pdf) and the attached associated documents (Q07_1987-02-09 Marquam Letter.pdf, Q07_1983-11-02 DOT Land Aquisition.pdf, Q07_1983-12-02 DOT Easement.pdf, Q07_1985-01-04 DOT Letter-Easement.pdf, and Q07_1986-12-21 OHD Marquam Easement Access.pdf). • On 20 June 1968, PGE granted the J.I. Case Company permission to store tractors on part of Parcel C (south of the Stephen Substation). PGE terminated the land use permit effective 24 September 1969; see the attached document (Q07_1968-06-20 JI Case Permit.pdf). • On 30 June 1972, PGE granted Northwest Natural Gas Company an easement for a 20-inch natural gas pipeline and its apparatus on the submerged land (below the ordinary low water line) adjacent to Parcel I; see the attached document (Q07_1972-06-30 1972 NWNtl Pipeline Esmt.pdf). • On 1 March 1973, PGE granted Reed College a use agreement for the PGE dock adjacent to Parcel G, allowing Reed College the right to moor a barge and float at the dock; see the attached document (Q07_1973-03-01 Reed College Moorage Agmt.pdf). Reed College renewed their lease in 1982 and in 1985; see the attached documents (Q07_1982_09-28 Reed College Moorage Agmt.pdf and Q07_1985-09-01 Reed College Moorage Agreement.pdf). This use agreement expired on 31 August 1986. To the best of PGE's knowledge, after reasonable inquiry, Reed College did not use the docks after the expiration of the lease. • On 20 March 1980, PGE granted Burns' Brothers a use agreement for the 90,000-barrel AST on Parcel H; see the attached document (Q07_1980-03-20 Burns' Fuel Storage Agreement.pdf). The agreement allowed Burns' Brothers to store No. 2	

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	diesel fuel in the AST. The term of the lease was 6 months. To the best of PGE's knowledge, after reasonable inquiry, Burns' Brothers did not use the storage tank after the expiration of the lease. • On 23 April 1980, PGE granted LUKA Holding Company Inc a permit to moor a 250-foot long vessel at the dock adjacent to Parcel I; see the attached document (Q07_1980-12-29 1980 Luka Permit.pdf). The term of the permit was from 1 June 1980 to 31 August 1980. The permit was extended to 31 December 1980. • On 1 September 1983, PGE granted Emanuel Hospital a permit to use the Helipad in Parcel D for the purpose of landing and refueling the hospital's life flight helicopter; see Exhibit F in the attached document (Q07_1986-12-31 OMSI Donation 18.5 Acres.pdf). The term of the permit was 5 years. The permit included the approval to install a refueling system, including a UST (EY-06), at the expense of Emanuel Hospital. • On 11 October 1983, PGE granted the City of Portland a permit to install and a 5-foot easement to maintain a cathodic protection control wire for the Bull Run Right-of-Way within a 4-inch duct in PGE's underground subway duct system along the eastern edge of Parcels A and B; see the attached documents (Q07_1983-10-11 COP Cathodic Protection Permit.pdf and Q07_1984-08-07 COP Cathodic Protection Approval.pdf). • On 1 March 1993, PGE granted Strode Eckert Photography the right to take photographs on PGE property (Parcels G, H, I, as well as Stephens Substation), presumably to take photographs of the new OMSI facility on Parcels A through F; see the attached document (Q07_1993-02-23 Property Use for Photos.pdf). The term of the lease was for three months, terminating on 1 June 1993. • On 27 April 1998, PGE conveyed the deed for the right-of-way (SE Water Ave) to the City of Portland for a public street; see the attached document (Q07_1998-04-27 COP ROW Deed.pdf). <u>Other Legal/Equitable Documents</u> • Oil Storage Tank Construction – In order to construct an oil tank farm on Parcel H, PGE had to obtain several city ordinances and acquired the remaining interest in the railroad tracks on Parcel H: o On 11 July 1957, PGE purchased the remaining interest in the scrap steel rail located on Block 32 and the adjacent vacant streets, within Parcel H, from the Georgia Pacific Plywood Company; see the attached document (Q07_1957-07-11 GPC Steel Rail.pdf). o On 26 September 1987, PGE was awarded Ordinance 106759 in which the City of Portland granted PGE a permit to erect a fuel AST on Parcel H (Blocks 29, 32, and 49); see the attached document (Q07_1957-09-26 Stor.Tank Permit COP	

EPA Question	Response	Records/Information Available
	Ord 106699.pdf). o On 9 October 1957, PGE was awarded Ordinance 106759 in which the City of Portland rezoned Blocks 48 and 49 within Parcels H and I to enable the construction of the oil tank farm on Parcel H (Block 49); see the attached document (Q07_1957-10-09 COP Street Vacation Ord 106759.pdf). • City of Portland Willamette Greenway – The City of Portland established the Willamette Greenway along the eastern shore of the Willamette River, extending into the northern portion of Station L through several ordinances and permits: o On 3 October 1979, the City of Portland passed Ordinance 148537 establishing the Willamette River Greenway Development Regulations; see the attached document (Q07_1979-10-03 COP Willamette Greenway Ord.pdf). o On 12 November 1986, PGE accepted the Planning and Zoning Codes (CU 63-86 and GP 10-86) for the greenway development for the eastbank esplanade; see the attached document (Q07_1986-11-12 COP Con Use Greenway Permit.pdf). Please note that the PGE acceptance letter incorrectly states that PGE did not own the affected Greenway properties (including Parcels A and B); the transfer of Parcels A through F to OMSI was not recorded until December 1986. o On 22 January 1988, the City of Portland passed Ordinance 160422, which granted the city/state the rights for improvements to the I-5 right-of-way and eastside esplanade, as well as PGE acceptance of the ordinance; see the attached document (Q07_1988-01-22 COP Greenway Ord 160422.pdf). • On 8 July 1992, Southern Pacific Co granted PGE a right-of-entry permit for PGE (and PGE consultants) to enter onto the Southern Pacific Co property adjacent to Stephens Substation to locate and assess the condition of the groundwater wells (W-4 and W-5) that PGE installed in 1987 in association with the Station L Site Investigation; see the attached document (Q07_1992-05-18 SPTC ROE Permit.pdf). This term of the permit was from 8 June 1992 to 8 July 1992. • On 12 March 1969, OMSI granted PGE a conditional use permit (CU 9-69) for a helipad on Parcel D; see the attached document (Q07_1986-12-31 OMSI Lease Agreement.pdf). Also see the responses to Questions 4 through 6, above.	
a. any deeds and/or transfer information between Respondent and Dulien Steel Products;	Not applicable. Question 7a is relevant only to the Rivergate North Substation. Information regarding this question is given in the separate 104(e) response for that site.	
b. deed and title information for Parcels R971340160, R971340180, R971350100, R971350480, R941191230, R971340130 and	Not applicable to Station L.	

EPA Question	Response	Records/Information Available
R971340200;		
c. a complete copy of the Memorandum of Contract Book 1292 p.616 for parcel R941191230, dated September 5, 1978;	Not applicable to Station L.	
8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.	Not applicable. PGE is not the current owner or operator of Station L.	
9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.	To the best of PGE's knowledge, after reasonable inquiry, PGE did not know of, and had no reason to know of, any disposal or placement of hazardous substances, waste, or materials on or at any part of Station L that may have occurred prior to its acquisition by PGE. On 6 March 1957, the City of Portland issued PGE a permit to extend five test borings in the street area between SE Caruthers St and SE Sherman St, west of SE Fourth Ave; see the document (Q52_1957-03-06 CoP Permit.pdf) attached in response to Question 52. To the best of PGE's knowledge, after reasonable inquiry, the testing of the street area occurred prior to the City of Portland conveying the vacated street to PGE on 17 March 1957; see the plat (Q04_Plats.pdf) attached in response to Question 4. To the best of PGE's knowledge, after reasonable inquiry, PGE does not have the test boring logs, analytical results from testing, or any further knowledge regarding these test borings. To the best of PGE's knowledge, after reasonable inquiry no other site investigations were performed on Station L prior to taking ownership.	See Question 4 Attachment Q04_Plats.pdf Also see Question 52 Attachment Q52_1957-03-06 CoP Permit.pdf
10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known: a. The dates of ownership b. All evidence showing that they controlled access to the Property c. All evidence that a hazardous	To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the information PGE has concerning the prior owners of Station L: <u>Parcel A</u> • Parcel A was purchased by PGE (as predecessor company OWPR) on 25 March 1905 from The Land Company of Oregon; see the plats (Q04_Plats.pdf and Q04_2006 Plats.pdf) attached in response to Question 4. • The attached Sanborn maps (Q10_Sanborn Maps Northern.pdf) show Parcel A in 1889, 1901, 1909, 1924, 1950, and 1969. The 1889 Sanborn map shows that the	Question 10 Attachments Q10_Sanborn Maps Northern.pdf

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substance, pollutant, or contaminant was released or threatened to be released at the Property during the period that they owned the Property.	Kline and Klinsing Stave Factory was present on the parcel. The 1901 Sanborn map shows that the property had a large vacant building adjacent to the river, a small trestle, a ship carpenter shed, and floats on the beach; the owner(s) of the structures/parcel is not identified in the Sanborn map. <u>Parcel B</u> • Parcel B was leased by PGE (as predecessor company OWPR) from 1904 to 1937. The parcel was originally leased by Fred S Morris on 28 February 1902 from the Stephens Land Co for a term of 30 years; however, the lease was assured by PGE (as predecessor company OWPR) on 23 November 1904. On 4 June 1937, PGE (as predecessor company PNPS) purchased Parcel B from HJ and Mable Wallace. See the plats (Q04_Plats.pdf and Q04_2006 Plats.pdf) attached in response to Question 4 • The attached Sanborn maps (Q10_Sanborn Maps Northern.pdf) show Parcel B in 1889, 1901, 1909, 1924, 1950, and 1969. The 1889 Sanborn map does not show any structures and does not identify the owner of the property. The 1901 Sanborn indentifies the property as a boat building yard; the owner(s) of this parcel is not identified in the Sanborn map. <u>Parcel C</u> • Parcel C was purchased by PGE (as predecessor company OWPR) on 25 March 1905 from The Land Company of Oregon; see the plats (Q04_Plats.pdf and Q04_2006 Plats.pdf) attached in response to Question 4. • The attached Sanborn maps (Q10_Sanborn Maps Northern.pdf) show Parcel C in 1901, 1909, 1924, 1950, and 1969. The 1901 Sanborn notes that a large portion of the parcel inundated with water during high river levels; the owner of this parcel is not identified in the Sanborn map. <u>Parcel D</u> • Parcel D was purchased by PGE (as predecessor company CSRC) on 30 September 1902 from the Ladd Estate. • The attached Sanborn maps (Q10_Sanborn Maps Southern.pdf) show Parcel D in 1901, 1909, 1924, 1950, and 1969. The 1901 Sanborn shows the CSRC's (a PGE predecessor company) Power Station (Station F) and a wharf adjacent to the parcel with scattered lumber piles. <u>Parcel E</u> • Parcel E was acquired by PGE through the following transactions: o On 31 December 1954, PGE acquired Lots 27 and 34, as well as the interest in the northern half of SE Lincoln St from the Georgia Pacific Plywood Company; see the documents (Q07_1954-12-30 Conveyance of Rights.pdf and Q07_1954-12-31 Deed_GP to PGE.pdf) attached in response to Question 7.	Q10_Sanborn Maps Southern.pdf Q10_1954-01-25 GP Indl Track Agreement.pdf Also see Question 4 Attachments Q04_Plats.pdf Q04_2006 Plats.pdf Also see Question 7 Attachments Q07_1954-12-30 Conveyance of Rights.pdf Q07_1954-12-31 Deed_GP to PGE.pdf Q07_1955 COP Ord 102169.pdf Q07_1955 COP Ord 102168.pdf Q07_1955-01-24 Petition to COP for Vacation.pdf Q07_1955-04-18 COP Resolution 26491.pdf Q07_1955-04-18 COP Resolution 26492.pdf Q07_1955-07-01 Deeds_GP to PGE.pdf Q07_1957 COP Ord 106070.pdf Q07_1957-03-28 COP Resolution 27242.pdf Q07_1957-05-22 COP Street Vacation Ord 105941.pdf Q07_1990-08-15 DSL QuitClaim Deeds.pdf Q07_1990-05-01 DSL Ownership Investigation.pdf

EPA Question	Response	Records/Information Available
	o On 1 June 1955, the City of Portland conveyed its interest in the vacated portion of SE Lincoln St (southern half), SE First Ave, and SE Second Ave to PGE through Ordinance 102169; see the documents (Q07_1955 COP Ord 102169.pdf, Q07_1955-04-18 COP Resolution 26492.pdf, and Q07_1955-01-24 Petition to COP for Vacation.pdf) attached in response to Question 7. • Through a 25 January 1954 Industrial Track Agreement, Inman-Poulsen Lumber Company (then owner of Parcel E) requested that the PTC build, maintain, and operate a spur railroad track across the eastern portion of Parcels E; see the attached document (Q10_1954-01-25 GP Indl Track Agreement.pdf). The parcel was purchased by the Georgia Pacific Plywood Company later that same year (1954). • The attached Sanborn maps (Q10_Sanborn Maps Southern.pdf) show Parcel E in 1901, 1909, 1924, 1950, and 1969. The 1901 Sanborn map shows that a northern portion of the parcel was part of a slough and that the remaining property had an old sawdust pile, a saw mill stable with wagon house, a sawdust & shavings bunker, a small structure labeled "oil ho," and several lumber piles owned by the Inman-Poulsen Lumber Co. The 1908 Sanborn map shows that the slough was filled in and that the property had a sawdust & shavings bunker, a water tank elevated on trestles, a sawdust conveyor, a building labeled "re sawing," and scattered piles of lumber owned by the Inman-Poulsen Lumber Co. The 1924 Sanborn map shows the Inman-Poulsen Lumber Co's elevated water tank, a conveyer, and a saw-refuse bin. The 1950 Sanborn map shows the Inman-Poulsen Lumber Co's elevated water tank, a rest room, a cut-off saw area, a sawdust conveyer, a planer shed, a re-saw building, and a lumber transfer shed. <u>Parcel F</u> • Parcel F was acquired by PGE through the following transactions: o On 14 December 1909, the northeast corner of Block 34, the western portion of Block 47, and the northern half of SE Lincoln St within Parcel F were purchased by PGE (as predecessor company PRLP) from Inman-Poulsen Lumber Co. o To the best of PGE's knowledge, after reasonable inquiry and based on the City of Portland Auditor's Office information available online, the City of Portland conveyed its interest in the vacated portion of SE Third Ave to PGE through Ordinance 123419 in October 1966. o On 1 June 1955, the City of Portland conveyed its interest in the vacated portion of SE Lincoln St (southern half) to PGE through Ordinance 102169; see the documents (Q07_1955 COP Ord 102169.pdf, Q07_1955-04-18 COP Resolution 26492.pdf, and Q07_1955-01-24 Petition to COP for Vacation.pdf) attached in response to Question 7. • The attached Sanborn maps (Q10_Sanborn Maps Southern.pdf) show Parcel F in 1901, 1909, 1924, 1950, and 1969. The 1901 and 1908 Sanborn maps show that the property was a slough; the owner(s) of the parcel is not identified on the Sanborn	

EPA Question	Response	Records/Information Available
	map. The 1924 and 1950 Sanborn maps of the property show that the property was filled in but does not show any structures; the owner(s) of the parcel is not identified. <u>Parcel G</u> • Parcel G (historically SE Second Ave, renamed SE Water Ave) was acquired by PGE through the following transactions: o On 1 July 1955, PGE purchased the vacated portion of SE Second Ave (which was previously vacated under Ordinance 102168) from the Georgia Pacific Plywood Company; see the documents (Q07_1955-07-01 Deeds_GP to PGE.pdf and Q07_1955 COP Ord 102168.pdf, Q07_1955-04-18 COP Resolution 26491.pdf and Q07_1955-04-18 COP Resolution 26492.pdf) attached in response to Question 7. o On 17 May 1957, the City of Portland conveyed its interest in the vacated portion of SE Second Ave within to PGE through Ordinance 105941, amended by Ordinance 106070; see the documents (Q07_1957-05-22 COP Street Vacation Ord 105941.pdf, Q07_1957 COP Ord 106070.pdf, and Q07_1957-03-28 COP Resolution 27242.pdf) attached in response to Question 7. • The attached Sanborn maps (Q10_Sanborn Maps Southern.pdf) show Parcel G in 1901, 1909, 1924, 1950, and 1969. The 1901 and 1908 Sanborn maps show that a portion of the Inman-Poulsen Lumber Co's lumber sheds were located on the southern portion of the parcel. The 1924 Sanborn map does not show any structures on the property owned by the Inman-Poulsen Lumber Co. The 1950 Sanborn map shows that a portion of the Inman-Poulsen Lumber Co's lumber sorting table was located on the property. <u>Parcel H</u> • Parcel H was acquired by PGE through the following transactions: o On 14 December 1909, PGE purchased the 0.07 acres of land in the northeast portion of Parcel H (identified as 'A' within Parcel H) from Inman-Poulsen Lumber Company. o On 1 July 1955, Georgia Pacific Plywood Company conveyed a 4 foot by 17.5 foot irregular portion of Block 49 (identified as 'D' within Parcel H), as well as its interest in Blocks 29, 32, and 49 and to vacated portions of SE Sherman St and SE Third Ave, to PGE; see the document (Q07_1955-07-01 Deeds_GP to PGE.pdf) attached in response to Question 7. o On 17 May 1957, the City of Portland conveyed its interest in Blocks 29 (eastern portion), 32, and 49 (western portion) and the vacated portion of SE Third Ave within Parcel H to PGE through Ordinance 105941, amended by Ordinance 106070; see the documents (Q07_1957-05-22 COP Street Vacation Ord 105941.pdf, Q07_1957 COP Ord 106070.pdf, and Q07_1957-03-28 COP Resolution 27242.pdf) attached in response to Question 7. • The attached Sanborn maps (Q10_Sanborn Maps Southern.pdf) show Parcel H in	

EPA Question	Response	Records/Information Available
	1901, 1909, 1924, 1950, and 1969. The 1901 and 1908 Sanborn maps show that the property had lumber sheds, lumber piles, and kilns owned by the Inman-Poulsen Lumber Co. The 1924 Sanborn map shows that the property had lumber sheds and kilns owned by the Inman-Poulsen Lumber Co, as well as a railroad spur on the eastern portion of the property. The 1950 Sanborn map shows several Inman-Poulsen lumber sorting tables on the property, as well as the railroad spur on the eastern portion of the property. <u>Parcel I</u> • Parcel I was acquired by PGE through the following transactions: o On 14 December 1909, PGE purchased the 0.50 acres of land in the northeast portion of Parcel I (identified as 'A' within Parcel I) from Inman-Poulsen Lumber Company. o On 1 June 1955, the City of Portland conveyed its interest in the vacated portion of SE Grant St to PGE through Ordinance 102168; see the documents (Q07_1955 COP Ord 102168.pdf, Q07_1955-04-18 COP Resolution 26491.pdf, and Q07_1955-04-18 COP Resolution 26492.pdf) attached in response to Question 7. o On 1 July 1955, Georgia Pacific Plywood Company conveyed Blocks 13, 28, 33, and 48 (western portion) and the vacated portions of SE Sherman St, SE First Ave, and SE Third Ave (which were previously vacated under Ordinance 102168 and Ordinance 105941, amended by Ordinance 106070), as well its interest in the western portion of Block 29 within Parcel I, to PGE; see the documents (Q07_1955-07-01 Deeds_GP to PGE.pdf, Q07_1955 COP Ord 102168.pdf, Q07_1957-05-22 COP Street Vacation Ord 105941.pdf, Q07_1957 COP Ord 106070.pdf, Q07_1955-04-18 COP Resolution 26491.pdf, Q07_1955-04-18 COP Resolution 26492.pdf, and Q07_1957-03-28 COP Resolution 27242.pdf) attached in response to Question 7. o On 17 May 1957, the City of Portland conveyed its interest in the western portion of Block 29 to PGE through Ordinance 105941, amended by Ordinance 106070; see the documents (Q07_1957-05-22 COP Street Vacation Ord 105941.pdf, Q07_1957 COP Ord 106070.pdf, and Q07_1957-03-28 COP Resolution 27242.pdf) attached in response to Question 7. o On 29 August 1990, the DSL issued PGE a quitclaim deed on the previously submerged lands lying above the ordinary low water line as it existed in 1990 (identified as 'L' within Parcel I), thereby relinguishing any claim the state may have had; see the documents (Q07_1990-08-15 DSL QuitClaim Deeds.pdf and Q07_1990-05-01 DSL Ownership Investigation.pdf) attached in response to Question 7. • Through a 25 January 1954 Industrial Track Agreement, the Inman-Poulsen Lumber Company (then owner of Parcel I) requested that the PTC build, maintain, and operate a spur railroad track across the eastern portion of Parcel I; see the attached document (Q10_1954-01-25 GP Indl Track Agreement.pdf). The parcel was	

EPA Question	Response	Records/Information Available
	purchased by the Georgia Pacific Plywood Company later that same year (1954). • The attached Sanborn maps (Q10_Sanborn Maps Southern.pdf) show Parcel I in 1901, 1909, 1924, 1950, and 1969. The 1901 and 1908 Sanborn maps show that the property was occupied by the Inman-Poulsen Lumber Co lumber mill, lumber piles, and a wharf adjacent to the parcel with scattered lumber piles. The 1924 and 1950 Sanborn maps show the Inman-Poulsen Lumber Co lumber mill, as well as the railroad spur on the southeastern portion of the property. To the best of PGE's knowledge, after reasonable inquiry, no site investigations were performed on Station L prior to PGE taking ownership, other than the 1957 street borings discussed in response to Question 9. To the best of PGE's knowledge, after reasonable inquiry, PGE has no knowledge of a hazardous substance, pollutant, or contaminant that was released or threatened to be released on Station L prior to PGE's purchase/acquisition.	
11. Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known: a. the dates of operation; b. the nature of prior operations at the Property; c. all evidence that they controlled access to the Property; and d. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they were operating the Property	See the responses to Questions 4 through 7 and Question 10. In addition, see the documents (Q04_Plats.pdf and Q04_2006 Plats.pdf) attached in response to Question 4, the acquisition documents attached in response to Question 7, and the documents attached in response to Question 10. To the best of PGE's knowledge, after reasonable inquiry, PGE has no information on prior operations on Station L other than the information contained in the responses to Questions 6, 7, and 10, above.	See Question 4 Attachments Q04_Plats.pdf Q04_2006 Plats.pdf Also see Question 7 Attachments Q07_1954-12-30 Conveyance of Rights.pdf Q07_1954-12-31 Deed_GP to PGE.pdf Q07_1955 COP Ord 102169.pdf Q07_1955 COP Ord 102168.pdf Q07_1955-01-24 Petition to COP for Vacation.pdf Q07_1955-04-18 COP Resolution 26491.pdf Q07_1955-04-18 COP Resolution 26492.pdf Q07_1955-07-01 Deeds_GP to PGE.pdf Q07_1957 COP Ord 106070.pdf Q07_1957-03-28 COP Resolution 27242.pdf Q07_1957-05-22 COP Street Vacation Ord 105941.pdf Q07_1990-08-15 DSL QuitClaim Deeds.pdf Q07_1990-05-01 DSL Ownership Investigation.pdf Also see Question 10 Attachments Q10_Sanborn Maps Northern.pdf Q10_Sanborn Maps Southern.pdf Q10_1954-01-25 GP Indl Track Agreement.pdf
12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic	Not applicable. To the best of PGE's knowledge, after reasonable inquiry, PGE did/does not have an aquatic lands lease or easement for the submersible land, including the sediment cap, adjacent to Station L.	

EPA Question	Response	Records/Information Available
lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.		
Section 3.0 - Description of Each Property		
13. Provide the following information about each Property identified in response to Question 4:		
a. property boundaries, including a written legal description;	Station L is located in Portland, Oregon on the eastern shore of the Willamette River below and just south of the Marquam (Interstate 5) Bridge. It is bounded by SE Market Street to the north, the Willamette River to the west, and SE Caruthers Street to the south, and by PTC property, Southern Pacific Co property, and SE Fourth Ave to the east. See the documents (Q04_Plats.pdf and Q04_2006 Plats.pdf) attached in response to Question 4 and the documents (Q05c_Property Detail_Parcels.pdf and Q05c_TaxMaps.pdf) attached in response to Question 5. The legal description of Station L is Township 1 South, Range 1 East, Section 3 of the Willamette Meridian, County of Multnomah, and State of Oregon, including Tax Lots: 1, 3, 4, 5, 100, 101, 200, 300, 301, 302, 400, and 500.	See Question 4 Attachments Q04_Plats.pdf Q04_2006 Plats.pdf Also see Question 5 Attachments Q05c_Property Detail_Parcels.pdf Q05c_TaxMaps.pdf
b. location of underground utilities (telephone, electrical, sewer, water main, etc.);	To the best of PGE's knowledge, after reasonable inquiry, the following is a summary of the underground utilities at the Station L during PGE's ownership: • Underground gas pipelines - In 1957, PGE signed a contract with Portland Gas and Coke Company for interruptible gas service; see The History of Portland General Electric Company, 1889 – 1981 attached in response to Question 77, which is part of the Supplemental Submittal S1. Natural gas was supplied by Portland Gas and Coke Company to Station L via an 8 5/8-inch diameter pipeline that entered the property near the east boundary (supplied the power plant) and a 2-inch pipeline that entered the property at the northern boundary (supplied the service garage); see Section 2.9 of the document (Q15_1984-01-27 SERA_Phase I.pdf) attached in response to Question 15. To the best of PGE's knowledge, after reasonable inquiry, Portland Gas and Coke Company did not have an easement for the gas pipelines within Station L. • Underground water lines - The attached document (Q13b_1912-12-22_Station L.pdf) shows the underground water utilities in 1912. The Sanborn maps (Q10_Sanborn Maps-Northern.pdf and Q10_Sanborn Maps-Southern.pdf) attached in response to Question 10, show the underground water utilities at Station L in 1901, 1909, 1924, 1950, and 1969. In 1984, there were three main water pipelines within Station L: an 8-inch water pipe that entered the property at the northern boundary and two 8-inch water pipes that entered the property near the SE corner; see Section 2.9 of the document (Q15_1984-01-27 SERA_Phase I.pdf) attached in response to Question 15.	Question 13 Attachments Q13b_1912-12-22_Station L.pdf Q13b_1950-09-06 Subway Plate Map.pdf Q13b_1956-11-19 COP DPW Waterline.pdf Q13b_1983-07-01 Utilities Figure.pdf Q13b_1986 Upper Sta L Figure.pdf Q13b_1986 Lower Sta L Figure.pdf Q13b_1990-04-11 Existing Utilities Verification.pdf Q13b_1996-01-10 KPTV Sewer.pdf Q13b_Fieldview.pdf Q13b_Mrkt St Garage Fencing & Drainage.pdf Q13b_Property Detail - Station L Sewer.pdf Q13b_1914-04-07 Bull Run Submerged Pipe Relocate.pdf Q13b_1914-09-01 Bull Run Plan&Profile of Sub Pipes.pdf Q13b_Caruthers Water Lines.pdf Q13i_1991-12-19 Catchbasin.pdf Also see Question 4 Attachment Q04_2006 Plats.pdf

EPA Question	Response	Records/Information Available
	To the best of PGE's knowledge, after reasonable inquiry, water was supplied to these water pipelines from connections to municipal water mains in the streets adjacent to Station L. To the best of PGE's knowledge, after reasonable inquiry and based on the attached document (Q13b_1956-11-19 COP DPW Waterline.pdf), these were not municipal water lines, and the City of Portland did not have easements for the water pipelines within Station L. The attached documents (Q13b_Caruthers Water Lines.pdf) show the municipal water lines adjacent to Station L. • Underground sewer utilities - Although the Stephen's Slough sewer line was located on Station L (northern portion of Parcel C), the property was not serviced by municipal sewer lines during PGE's ownership. Instead, Station L sanitary waste was handled on site with septic tanks/cesspools during PGE's ownership. The attached document (Q13b_1986 Lower Sta L Figure.pdf) shows the location of the septic tank /cesspool in the southern portion of Parcel C in 1986, and the attached document (Q13b_1956-11-19 COP DPW Waterline.pdf) shows the location of the restrooms in the northern portion of Parcel C in 1956, which likely discharged to a septic tank/cesspool. The attached document (Q13b_Property Detail_Station L Sewer.pdf) shows the current sewer utilities for the Station L parcels from Portland Maps; please note that the sewer lines shown in the document were built between 1992 and 1994 (after PGE sold Parcels A through F to OMSI). The attached document (Q13b_1996-01-10 KPTV Sewer.pdf) shows the sewer lines and sewer line connections installed in 1996 adjacent to Parcel H, which PGE sold to KPTV in 1995. • Underground telephone lines - Telephone service from Pacific Northwest Bell Co was provided from connections to telephone lines along the north, east, and southern boundaries of the site; see Section 2.9 of the document (Q15_1984-01-27 SERA_Phase I.pdf) attached in response to Question 15. To the best of PGE's knowledge, after reasonable inquiry, Pacific Northwest Bell Co did not have a telephone line easement within Station L. The attached documents (Q13b_1983-07-01 Utilities Figure.pdf and Q13b_1986 Upper Sta L Figure.pdf) show the underground telephone lines at Station L in 1983 and 1986. • Stormwater drainage pipelines - From at least 1954 until the parcels were sold, water that did not infiltrate into the ground in the north portion of Station L (Parcels A through D) that did not infiltrate into the ground or enter a drywell was drained by means of a series of catch basins and stormwater sewer lines, which emptied into the Willamette River. From at least 1957 until the parcels were sold, water that did not infiltrate into the ground throughout the majority of the southern portion of Station L (Parcels E through I) was drained by a catch basin collection system, including an oil water separator, which also emptied into the Willamette River. As noted in the document (Q13i_1991-12-19 Catchbasin.pdf) attached in response to Question 13i, the catch basin that had drained the northeastern portion of Parcel I was damaged during OMSI construction and from at least December 1991 until the property was sold, the stormwater in the northeastern portion of Parcel I infiltrated through the	Also see Question 10 Attachments Q10_Sanborn Maps-Northern.pdf Q10_Sanborn Maps-Southern.pdf Also see Question 15 Attachment Q15_1984-01-27 SERA_Phase I.pdf

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	ground. The attached documents (Q13b_1986 Upper Sta L Figure.pdf, Q13b_1986 Lower Sta L Figure.pdf, and Q13b_Mrkt St Garage Fencing & Drainage.pdf) show the location of Station L drainage features. For further details, see the responses for Questions 13i and 18. • PGE electrical underground utilities – Historically, utility lines ran from other locations (including Stephen Substation) to the Lincoln Substation within Station L, where the voltage was stepped down, and feeder lines ran from the Lincoln Substation to the Station L power plant and auxiliary operations, to Jefferson Substation, and to Urban Substation. The attached documents (Q13b_1912-12-22_Station L.pdf, Q13b_1950-09-06 Subway Plate Map.pdf, and Q13b_1983-07-01 Utilities Figure.pdf) show the underground electrical utilities in 1912, 1950, and 1983. After PGE sold Parcels A-F to OMSI in 1986, only the electrical utilities within the retained PGE easements were kept in service. All other PGE underground electric facilities within Parcels A-F were idle and abandoned. See the attached document (Q13b_1990-04-11 Existing Utilities Verification.pdf) and the plat (Q04_2006 Plats.pdf) attached in response to Question 4, which shows the retained electric utilities easements. The attached fieldview document for Stephens Substation (Q13b_Fieldview.pdf) shows the underground electrical utilities in the northern half of the Station L property. Eight of the eighteen Stephens Substation underground feeders (Stephn-11054, Stephn-11055, Stephn-11092, Stephn-11093, Stephn-11095, Stephn-11096, Stephn-11097, and Stephn-11099) route through the Station L property. These copper and aluminum underground feeders are insulated cables routed in either clay duct banks or PVC conduit. The conduits/cables are buried at various depths with a minimum depth of approximately 3 feet. Each feeder runs from the Stephens Substation to a pulling/sectionalizing vault outside of the substation (several vaults are located within Station L). Four of the eight feeders (Stephn-11055, Stephn-11092, Stephn-11097, and Stephn-11099) that route through Station L transition to submersible ("submarine") rated insulated cable as they cross the Willamette River to supply the downtown Portland area. For further information on these submarine cables, see the separate 104(e) response for Miscellaneous Spills, Distribution Network, and Submerged Cables. Also see the separate 104(e) response for Stephens Substation. Also attached are two documents (Q13b_1914-04-07 Bull Run Submerged Pipe Relocate.pdf and Q13b_1914-09-01 Bull Run Plan&Profile of Sub Pipes.pdf) that show the City of Portland's Bull Run pipeline that passes between and adjacent to Parcels B and C, but is not located within Station L.	
c. location of all underground pipelines whether or not owned,	In addition to the gas, water, sewer, and site drainage pipelines discussed in response to Question 13b, above, Station L also had fuel oil pipelines:	Question 13 Attachments Q13b_1912-12-22_Station L.pdf Q13b_1986 Upper Sta L Figure.pdf

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controlled or operated by you;	• Fuel oil pipelines conveyed oil from five USTs (EY-01 through EY-05) southwest to the Station L power plant (Parcel C), • Fuel oil pipelines were associated with the eight USTs (EY-07 through EY-15) in the Market Street Garage area (Parcel A), several of which conveyed fuel to the PGE vehicle fueling station, • Fuel oil pipelines conveyed Jet A fuel from the helicopter pad UST (EY-06) to the helicopter pad fueling station (Parcel D), • Fuel oil pipelines ran from the oil dock (Parcel I) to the AST in the tank farm (Parcel H) and the Station L power plant (Parcel C), and • Fuel oil pipelines ran from the Station L oil docks to the Station L power plant (Parcel C). The 1912 document (Q13b_1912-12-22_Station L.pdf) attached in response to Question 13b shows the fuel oil pipelines that ran from the USTs southwest to the Station L power plant. The attached documents (Q13c_1957-12-18 Fuel Oil Storage Piping Plan.pdf and Q13c_1973-5-18 Oil Pipes and Storage Tanks.pdf) show the pipelines running from the tank farm and oil docks to the power plant in 1957 and 1973. The documents (Q13b_1986 Upper Sta L Figure.pdf and Q13b_1986 Lower Sta L Figure.pdf) attached in response to Question 13b also show the fuel oil pipelines in 1986. Also see Figures 4-5 through 4-11 in the Station L Phase III Site Investigation report (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15.	Q13b_1986 Lower Sta L Figure.pdf Q13c_1957-12-18 Fuel Oil Storage Piping Plan.pdf Q13c_1973-5-18 Oil Pipes and Storage Tanks.pdf Also see Question 15 Attachment Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf
d. surface structures (e.g., buildings, tanks, pipelines, etc.);	To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the major surface structures at Station L during PGE's ownership: <u>Station F Power Plant</u> PGE operated the Station F power plant from approximately 1901 to 1911. The Station F power plant was removed sometime between 1911 and 1924. The following Station F power plant structures are shown in the 1901 and/or 1909 Sanborn maps (Q10_Sanborn Maps-Southern.pdf) attached in response to Question 10: • Station F power plant building with an engine room and power house; • Two conical cinder collectors; • A machine shop (blacksmith); and • A fuel sawdust shed, a sawdust conveyor, and a sawdust and shavings bunker. <u>Station L Power Plant and Ancillary Facilities/Operations</u> PGE operated the Station L power plant from approximately 1911 to 1975. PGE also operated several ancillary facilities associated with the Station L Power Plant. The Station L power plant structures were removed between 1986 and 1990, unless otherwise noted below. To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the major Station L power plant structures (power plant building and associated facilities): • Station L power plant building – In 1910/1911, the power plant consisted of a boiler room and a generator/turbine room. Sometime between 1921 and 1950, a second	Question 13 Attachments Q13d_1963-09-10 Rectifiers.pdf Q13d_1977-04-19 One-Line Diagram.pdf Q13d_1982 Sta L Plant Arrangement.pdf Q13d_Sta L Mid-80s Storage Yard Photos.pdf Q13d_1990-03-02 Plan View Existing Facilities.pdf Q13d_Station L Railways.pdf Q13d_Undated Misc Site Photos.pdf All Question 13e, 13k, 13l, and 13m Attachments Also see Question 10 Attachments Q10_Sanborn Maps-Northern.pdf Q10_Sanborn Maps-Southern.pdf Also see Question 15 Attachments Q15_1984-01-27 SERA_Phase I.pdf Q15_1987-07-06 HC Vol PCB Cleanup Plan.pdf Q15_1988-02-29 HC RAP Vol I.pdf Q15_1991-1992 CH2M Helipad Cleanup Documents.pdf Q15_1994-08-09 EPA Site Investigation Report.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf

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	boiler room and a power house extension were added. • Hog fuel storage – From 1910/1911 to approximately 1956, an outdoor hog fuel storage pile was located on Parcels A and E with associated conveyors. In addition, there was a sawdust & shavings bunker with associated conveyors south of the power plant until sometime prior to 1950, when the bunker was removed but the conveyor drive house (conveyor engines) remained. • Lincoln Substation – In 1910/1911, the Lincoln Substation consisted of a control building, transformers, capacitors, and transmission and distribution structures. Substation equipment may have been added, removed, or upgraded over the years of operation (between 1911 and 1975). • Tank Farm – In approximately 1957, a tank farm with a 96,690-barrel AST was constructed on Parcel H; • Oil docks – In 1910/1911, an oil dock was located adjacent to the power plant. In approximately 1957, a second oil dock was constructed south of the power plant (adjacent to Parcel I) in order to pump fuel from barges to the tank farm; it was removed in 1994. • Railroads were located along the eastern side of Station L (Parcels F, H, and I). <u>Other PGE Facilities</u> PGE also operated other facilities at Station L. PGE ceased operations at Station L (other than remediation) in 1986 on Parcels A through H. PGE continued to use Parcel I for pole, equipment, overhead wire, and vehicle storage until 2005. To the best of PGE's knowledge, after reasonable inquiry, the other PGE facilities' structures were removed between 1986 and 1994, unless otherwise noted below. To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the other major PGE facilities' structures: • Central Division Garage (also commonly known as Market Street Garage) – Sometime prior to 1945, the garage was constructed on the northeastern area of Parcel A and contained a vehicle service shop, a spray booth, a machine shop, a traveling crane, a tire repair and storage area, storeroom, offices, vehicle lifts, lunch room, locker, and restroom facilities. • Garage Fueling Station –Sometime prior to 1945, the fueling station was constructed on Parcel A adjacent to the Central Division Garage and included five gas pumps, a canopy with overhead lube rack, and an attendant station, as well as eight USTs. • Communication Center – Sometime prior to 1966, a communication center was constructed on the northwest area of Parcel A and contained office spaces, materials storage area, Department Records Center, washrooms, and a garage bay for working on the communications system of company vehicles. • Radio Shop, Microwave Tower, and Mobile Radio Building – Sometime prior to 1966, these structures were constructed on the northwestern portion of Parcel B. • Machine Shop – Sometime prior to 1945, the machine shop was constructed on the northern area of Parcel C. • Welding Shop – Sometime prior to 1950, the welding shop was constructed on the northern area of Parcel C. • Sandblast Shed - Sometime prior to 1966, the sandblast shed was constructed on the	

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	southern area of Parcel B, adjacent to the welding shop. • Analytical Lab – From approximately 1974 to 1976, two large, joined, mobile home-style structures were temporarily placed on the southeast area of Parcel C for temporary use as the PGE analytical lab. • Store Room No. 1 – From approximately 1909 until to sometime between 1924 and 1945, Store Room No. 1 was located on Parcel A. • Electrical Maintenance & Construction (EM&C) storage building – From sometime prior to 1975 (but after 1966), this building was located on Parcel C. • Public relations storage building – From sometime prior to 1975 (but after 1966), this building was located on Parcel I. • Planer Building – The building was acquired when PGE purchased Parcel E. • Helicopter Pad – PGE constructed the helicopter pad on Parcel D sometime prior to 1975 (but after 1966). In 1983, under a use permit granted by PGE, Emanuel Hospital (Life Flight) had a refueling system installed, including a UST. • PGE Station L Office – From sometime prior to 1945, the PGE Station L office was located on Parcel B. • Filter House – From sometime prior to 1945, the filter house was located on Parcel C. • Pole Operations Building – From sometime prior to 1945 until sometime between 1966 and 1975, the Pole Operations Building was Located on Parcel A, • Electricians Building – From sometime prior to 1945 until sometime between 1966 and 1975, the Electricians Building was located on Parcel C. • Other various smaller structures and buildings (e.g., mobile oil storage tanks, lumber sheds, hoist houses, paint/chemical storage sheds, other small storage sheds, vacant buildings, etc) were located at Station L during the approximately 85 years of PGE (or PGE predecessor) operations on the property. See the attached documents, the response for Question 5g, the Sanborn maps (Q10_Sanborn Maps-Northern.pdf and Q10_Sanborn Maps-Southern.pdf) attached in response to Question 10, and the response and documents attached for Questions 13e, 13k, 13l, and 13m. Also see the Station L historical/background information in the reports (Q15_1984-01-27 SERA_Phase I.pdf, Q15_1987-07-06 HC Vol PCB Cleanup Plan.pdf, Q15_1988-02-29 HC RAP Vol I.pdf, Q15_1991-1992 CH2M Helipad Cleanup Documents.pdf, Q15_1994-08-09 EPA Site Investigation Report.pdf, and Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15.	
e. over-water structures (e.g., piers, docks, cranes, etc.);	To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the over-water structures at Station L during PGE's ownership of the parcels: • From approximately 1909 to sometime prior to 1966, wharfs/docks were located adjacent to Parcels A, B, C, D, and E. • From approximately 1910/1911 to 1986, an oil dock was located adjacent to the power plant (Parcel C). From approximately 1911 to 1965, oil from docked tankers/barges was piped to the power plant. • From approximately 1957 to 1994, a second oil dock was located south of the power plant (adjacent to Parcel I). Oil from docked tankers/barges was piped to the tank	Question 13 Attachments Q13e_1958-02-25 Fuel Storage Dock and Walkway.pdf Q13e_1958-02-28 Fuel Storage Pipeline&Dolphin Plan.pdf Q13e_1994-12-19 Dock Photos.pdf Q13b_1912-12-22_Station L.pdf Q13b_1986 Upper Sta L Figure.pdf Q13b_1986 Lower Sta L Figure.pdf Q13c_1973-5-18 Oil Pipes and Storage Tanks.pdf Q13k_1910 Original Construction Data and Photos.pdf

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	farm in the southeastern portion of Parcel H. See the attached documents, the response for Question 5g, the Sanborn maps (Q10_Sanborn Maps-Northern.pdf and Q10_Sanborn Maps-Southern.pdf) attached in response to Question 10, and the documents (Q13b_1912-12-22_Station L.pdf, Q13b_1986 Upper Sta L Figure.pdf, Q13b_1986 Lower Sta L Figure.pdf, Q13c_1973-5-18 Oil Pipes and Storage Tanks.pdf, Q13k_1910 Original Construction Data and Photos.pdf, and Q13k_Station L Photo History.pdf) attached in response to Questions 13e, 13b, and 13k. Also see Figures 2-1 through 2-4 in the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15.	Q13k_Station L Photo History.pdf Also see Question 10 Attachments Q10_Sanborn Maps-Northern.pdf Q10_Sanborn Maps-Southern.pdf Also see Question 15 Attachment Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf
f. dry wells;	The attached document (Q13f_1954-1966 Market St Garage Memos.pdf) notes that only one dry well near the southwest corner of the Central Division Garage (also known as the Market Street Garage) in Parcel A was intended to be installed in 1954, but that the plan provided for intalling all the wells, either simultaneously or progressively, as the need arose. The document further notes that a second dry well was installed in 1966, in the immediate vicinity of the gasoline USTs (Parcel A). The document (Q13b_Mrkt St Garage Fencing & Drainage.pdf) attached in response to Question 13b shows the locations of the drywells. As shown in the 1986 figure (Q13b_1986 Upper Sta L Figure.pdf) attached in response to Question 13b, a third dry well was located immediately north of the power plant (Parcel C).	Question 13 Attachment Q13f_1954-1966 Market St Garage Memos.pdf Q13b_1986 Upper Sta L Figure.pdf Q13b_Mrkt St Garage Fencing & Drainage.pdf
g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);	To the best of PGE's knowledge, after reasonable inquiry, during PGE's historical Station L ownership and operation (early 1900s to 1986/1995/2005) of Station L, other than remedial activities, the only treatment or control device at Station L was the stormwater control and secondary spill containment system (including an oil water separator), which is described in response to Questions 13i and 19. In order to fulfill the OMSI donation contingency and the Oregon DEQ Voluntary Cleanup consent order, PGE implemented the following treatment or control devices at Station L (Parcels A and C, which PGE had sold to OMSI in 1986): • In 1989, PGE pumped, treated, and discharged the water contents (liquid) from two of the Station L USTs (likely EY-03 and EY-04) into the municipal sanitary sewer; see the documents (Q50_1989-03-06_PGE to BES_UST Discharge.pdf and Q50_1989-05-22_PGE to BES_UST Discharge.pdf) attached in response to Question 50, as well as the document (Q52_1989-09-18_PGE Memo on UST Decom.pdf) attached in response to Question 52. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know the total quantity of water discharged to the sanitary sewer. • In 1989, PGE treated (filtered) ACM-contaminated waste water generated from washing equipment, building interiors, and personnel during the removal of asbestos from Station L. The treated water was then discharged to the municipal sanitary sewer lines under a City of Portland special discharge permit. During the discharges, asbestos-containing water was inadvertently discharged to the sewer due to an apparent failure in the asbestos filtration system. For further details, see the documents (Q15_1989-01-09 Tech Spec for Asbestos Abatement.pdf) attached in	See Question 15 Attachments Q15_1989-01-09 Tech Spec for Asbestos Abatement.pdf Q15_1990-07 CH2M_PCB River Sed Design Rept.pdf Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf Q15_1993-12-20 Conceptual Design Air Sprg Sys.pdf Q15_1994 AS-1 ASRS Construction Log.pdf Q15_1994-1995 GW Air Sparging Results.pdf Q15_1998-07-23 Well Abandonment Plan.pdf Q15_1994-1998 CH2M_Air Sparging Progress Reports.pdf Also see Question 21 Attachments Q21c_1989-03-23 PAS Memo.pdf Q21c_1989-04-04 PAS Memo.pdf Q21c_1989-06-13 HMS Memo.pdf Q21c_1989-10-02 HMS Memo.pdf Q21c_1989-10-04 Water Disposal Work Plan.pdf Also see Question 50 Attachments Q50_1989-03-06_PGE to BES_UST Discharge.pdf Q50_1989-05-22_PGE to BES_UST Discharge.pdf Q50_1989-07-05 COP to PGE_Asbestos.pdf Q50_1989-07-10 Asbestos Discharge Permit Precon.pdf Q50_1989-10-05 COP to PGE_Asbestos.pdf

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	response to Question 15, the documents (Q21c_1989-03-23 PAS Memo.pdf, Q21c_1989-04-04 PAS Memo.pdf, Q21c_1989-06-13 HMS Memo.pdf, Q21c_1989-10-02 HMS Memo.pdf, and Q21c_1989-10-04 Water Disposal Work Plan.pdf) attached in response to Question 21, the documents (Q50_1989-07-05 COP to PGE_Asbestos.pdf, Q50_1989-07-10 Asbestos Discharge Permit Precon.pdf, Q50_1989-10-05 COP to PGE_Asbestos.pdf, Q50_1989-10-13 PGE to COP_Asbestos Removal.pdf, and Q50_1989-10-25 COP to PGE_Asbestos.pdf) attached in response to Question 50, the response and documents (Q51_1989-09-28 Permit Compliance Order.pdf, Q51_1989-10-25 Permit Compliance Follow Up.pdf, and Q51_1990-02-05_PGE to COP-Asbestos concerns.pdf) attached for Question 51, and the documents (Q52_1989-06-14 Special Permit Request.pdf, Q52_1989-06-30 Wastewater Discharge Permit.pdf, Q52_1989-09-22 Permit Modification.pdf, Q52_1989-09-25 Permit Modification.pdf, and Q52_1989-10-05 Asbestos Permit Modification.pdf) attached in response to Question 52. • In 1990, during the Phase II sediment remediation (removal), CH2MHill, on behalf of PGE, installed a sediment dewatering and water treatment facility adjacent to the Station L power plant and the river. The water removed from the sediment was treated (filtered), prior to discharge to the Willamette River under a temporary (two-month) NPDES permit. For further details, see the documents (Q15_1990-07 CH2M_PCB River Sed Design Rept.pdf and Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf) attached for Question 15. • In 1994, CH2MHill, on behalf of PGE, installed an air sparging remediation system to reduce the BTEX concentrations in the groundwater under Parcel A. At varying intervals from 1994 to 1997, CH2MHill monitored the water and air quality in the wells. Due to the decline of BTEX concentrations in groundwater and because the air sparging remediation system had reached its threshold of effectiveness, the air sparging remediation system was abandoned in January 1998, including the abandonment of the monitoring and process wells. For further details, see the response and documents (Q15_1993-12-20 Conceptual Design Air Sprg Sys.pd, Q15_1994 AS-1 ASRS Construction Log.pdf, Q15_1994-1995 GW Air Sparging Results.pdf, Q15_1994-1998 CH2M_Air Sparging Progress Reports.pdf, and Q15_1998-07-23 Well Abandonment Plan.pdf) attached for Question 15, as well as the documents (Q50_1993-07-23 CH2MHill to DEQ.pdf, Q50_1993-08-09 DEQ to CH2MHill.pdf, Q50_1994-02-23 CH2MHill-Brown to DEQ-Burnet.pdf, Q50_1994-04-13 CH2MHill-Wuttig to DEQ-Burton.pdf, Q50_1994-05-12 CH2MHill-Wuttig to WRD-Carter.pdf, Q50_1994-06-20 CH2MHill-Wuttig to WRD-Carter.pdfQ50_1997-12-29 DEQ-Kiernan to PGE-Norton.pdf, Q50_1998-01-16 PGE-Norton to DEQ-Kiernan.pdf, and Q50_1998-01-22 DEQ-Kiernan to PGE-Norton.pdf) attached in response to Question 50. Also see the response to Question 13h.	Q50_1989-10-13 PGE to COP_Asbestos Removal.pdf Q50_1989-10-25 COP to PGE_Asbestos.pdf Q50_1993-07-23 CH2MHill to DEQ.pdf Q50_1993-08-09 DEQ to CH2MHill.pdf Q50_1994-02-23 CH2MHill-Brown to DEQ-Burnet.pdf Q50_1994-04-13 CH2MHill-Wuttig to DEQ-Burton.pdf Q50_1994-05-12 CH2MHill-Wuttig to WRD-Carter.pdf Q50_1994-06-20 CH2MHill-Wuttig to WRD-Carter.pdf Q50_1997-12-29 DEQ-Kiernan to PGE-Norton.pdf Q50_1998-01-16 PGE-Norton to DEQ-Kiernan.pdf Q50_1998-01-22 DEQ-Kiernan to PGE-Norton.pdf Also See Question 51 Attachments Q51_1989-09-28 Permit Compliance Order.pdf Q51_1989-10-25 Permit Compliance Follow Up.pdf Q51_1990-02-05_PGE to COP-Asbestos concerns.pdf Also see Question 52 Attachments Q52_1989-06-14 Special Permit Request.pdf Q52_1989-06-30 Wastewater Discharge Permit.pdf Q52_1989-09-18_PGE Memo on UST Decom.pdf Q52_1989-09-22 Permit Modification.pdf Q52_1989-09-25 Permit Modification.pdf Q52_1989-10-05 Asbestos Permit Modification.pdf
h. groundwater wells, including drilling logs;	To the best of PGE's knowledge, after reasonable inquiry, there were no groundwater wells at Station L during PGE's historical ownership and operations (early 1900s to 1986/1995/2005).	See Question 15 Attachments Q15_1988-01-21 HC Soil-GW Quality Assessment.pdf Q15_1988-05-09 SweetEdwards_GWReport.pdf

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	In order to fulfill the OMSI donation contingency and the Oregon DEQ Voluntary Cleanup consent order, PGE (via their consultants/contractors) installed groundwater wells at Station L for investigation and remediation purposes. The following summarizes the groundwater wells installed at Station L: • In August 1987, five groundwater monitoring wells were installed. Two of the wells (W-4 and W-5) were located east of Station L (on Southern Pacific Co property) to monitor upgradient groundwater quality, one monitoring well (W-3) was located within Stephens Substation, and two monitoring wells were located on site near the helipad (W-2) and the pole operations training area (W-1). See the reports (Q15_1988-01-21 HC Soil-GW Quality Assessment.pdf and Q15_1988-05-09 SweetEdwards_GWReport.pdf) attached in response to Question 15, as well as Figure 3-3, Section 3, and Appendix L of the report (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. • In July 1990, an attempt was made to locate and inspect the five monitoring wells (W-1 through W-5): o Monitoring wells W-4 and W-5 were found to have been damaged with the PVC casing removed and the boreholes filled in with bentonite. PGE was unsuccessful in determining who damaged the wells and whether they were abandoned in accordance with OAR 690-240-135. o Monitoring wells W-1 and W-2 were located and appeared to be in good shape. o Monitoring well W-3 could not be located. • In November 1990, further attempts were made to locate and inspect the three onsite monitoring wells (W-1 through W-3): o Monitoring wells W-2 and W-3 were located and discovered to have been damaged by OMSI construction activities. • In February 1991, monitoring wells W-2 and W-3 were abandoned in accordance with OAR 690-240-135; see Appendix B of the report (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. • In July 1992, PGE installed three new monitoring wells (W-6, W-7, and W-8) because of the five original monitoring wells, only monitoring well W-1 was in sufficiently good condition for use in the Phase III site investigation. See Figure 3-3, Section 3, and Appendices C and L of the report (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. Also see the groundwater investigation work plan (Q15_1992-07 CH2M_Phase III_GW Invest WP_Final.pdf) attached in response to Question 15. o Monitoring well W-6 was installed near the helipad (in Parcel D) to replace abandoned monitoring well W-2. o Monitoring well W-7 was installed on the upgradient boundary of the site (within Stephens Substation) near destroyed monitoring well W-4. o Monitoring well W-8 was installed downgradient of the area previously occupied by USTs EY-07 through EY-15 (in Parcel A, south of the Central Division Garage). o In addition, PGE rehabilitated the surface completion for monitoring well W-1.	Q15_1992-07 CH2M_Phase III_GW Invest WP_Final.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf Q15_1993-12-20 Conceptual Design Air Sprg Sys.pdf Q15_1994 AS-1 ASRS Construction Log.pdf Q15_1994-1995 GW Air Sparging Results.pdf Q15_1994-1998 CH2M_Air Sparging Progress Reports.pdf Also see Question 50 Attachments Q50_1993-07-23 CH2MHill to DEQ.pdf Q50_1993-08-09 DEQ to CH2MHill.pdf Q50_1994-02-23 CH2MHill-Brown to DEQ-Burnet.pdf Q50_1994-04-13 CH2MHill-Wuttig to DEQ-Burton.pdf Q50_1994-05-12 CH2MHill-Wuttig to WRD-Carter.pdf Q50_1994-06-20 CH2MHill-Wuttig to WRD-Carter.pdf Q50_1997-12-29 DEQ-Kiernan to PGE-Norton.pdf Q50_1998-01-16 PGE-Norton to DEQ-Kiernan.pdf Q50_1998-01-22 DEQ-Kiernan to PGE-Norton.pdf

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	• In October 1993, three new monitoring wells (W-9, W-10, and W-11) were installed in Parcel A because monitoring well W-8 had BTEX concentrations above screening criteria; see the document (Q15_1993-12-20 Conceptual Design Air Sprg Sys.pdf) attached in response to Question 15. Also see the documents (Q50_1993-07-23 CH2MHill to DEQ.pdf and Q50_1993-08-09 DEQ to CH2MHill.pdf) attached in response to Question 50. • Between April and June 1994, seven process wells (AS-1 through AS-7) were installed as part of the air sparging remediation system to reduce BTEX concentrations in groundwater beneath Parcel A. Monitoring wells W-1 through W-8 were used to monitor the BTEX concentration in the groundwater during the air sparging remediation; see the documents (Q15_1994-1998 CH2M_Air Sparging Progress Reports.pdf, Q15_1994 AS-1 ASRS Construction Log.pdf, and Q15_1994-1995 GW Air Sparging Results.pdf) attached in response to Question 15. Also see the documents (Q50_1994-02-23 CH2MHill-Brown to DEQ-Burnet.pdf, Q50_1994-04-13 CH2MHill-Wuttig to DEQ-Burton.pdf, Q50_1994-05-12 CH2MHill-Wuttig to WRD-Carter.pdf, and Q50_1994-06-20 CH2MHill-Wuttig to WRD-Carter.pdf) attached in response to Question 50. • Due to the decline of BTEX concentrations in groundwater beneath Parcel A and because the air sparging remediation system had reached its threshold of effectiveness, the air sparging remediation system was abandoned in January 1998, including the abandonment of the monitoring wells (W-8 through W-11) and process wells (AS-1 through AS-7); see the document (Q15_1994-1998 CH2M_Air Sparging Progress Reports.pdf) attached in response to Question 15. Also see the documents (Q50_1997-12-29 DEQ-Kiernan to PGE-Norton.pdf, Q50_1998-01-16 PGE-Norton to DEQ-Kiernan.pdf, and Q50_1998-01-22 DEQ-Kiernan to PGE-Norton.pdf) attached in response to Question 50.	
i. stormwater drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;	Although the Stephen's Slough sewer line was located on Station L (northern portion of Parcel C), the property was not serviced by municipal sewer lines during PGE's ownership. During PGE's ownership of Station L, sanitary waste was handled on site with septic tanks/cesspools. The attached document (Q13b_1986 Lower Sta L Figure.pdf) shows the location of a septic tank/cesspool in the southern portion of Parcel C in 1986, and the attached document (Q13b_1956-11-19 COP DPW Waterline.pdf) shows the location of the restrooms in the northern portion of Parcel C in 1956, which likely discharged to a septic tank/cesspool. To the best of PGE's knowledge, after reasonable inquiry, PGE has no knowledge of where, when, or how the septic tanks/cesspools were emptied or maintained at Station L. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know the details of the site's stormwater drainage prior to the mid-1950s. From at least 1954 until the parcels were sold, water that did not infiltrate into the ground in the northern portion of Station L (Parcels A through D) that did not infiltrate into the ground or enter a drywell was drained by means of a series of catch basins and stormwater sewer lines, which emptied into the Willamette River. From at least 1957 until the parcels were sold, water that did not infiltrate into the ground throughout the majority of the southern portion of Station L (Parcels E through I) was drained by a catch basin collection system, including an oil water separator, which also emptied into the	Question 13 Attachments Q13b_1986 Upper Sta L Figure.pdf Q13b_1986 Lower Sta L Figure.pdf Q13b_Mrkt St Garage Fencing & Drainage.pdf Q13i_1957-09-20_Fuel Oil Storage Storm Drain Profile.pdf Q13i_1975-10-07 EM&C Storage Yard Vicinity Map.pdf Q13i_1991-12-19 Catchbasin.pdf

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	Willamette River. As noted in the attached document (Q13i_1991-12-19 Catchbasin.pdf), the catch basin that had previously drained the northeastern portion of Parcel I was damaged during OMSI construction. Therefore, from at least December 1991 until the property was sold, the stormwater in the northeastern portion of Parcel I infiltrated into the ground. The documents (Q13b_1986 Upper Sta L Figure.pdf, Q13b_1986 Lower Sta L Figure.pdf, and Q13b_Mrkt St Garage Fencing & Drainage.pdf) attached in response to Question 13b show the location of the Station L drainage features. Also see the attached documents (Q13i_1957-09-20_Fuel Oil Storage Storm Drain Profile.pdf and Q13i_1975-10-07 EM&C Storage Yard Vicinity Map.pdf). For further details, see the response to Question 18.	
j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed.	To the best of PGE's knowledge, after reasonable inquiry, the only subsurface disposal fields or UICs located at Station L during PGE's historical ownership and operations (early 1900s to 1986/1995/2005) were the drywells discussed in response to Question 13f and septic tanks/cesspools discussed in response to Questions 13b and 13i. As part of the stormwater control at Station L, drywells, catch basins, stormwater lines, and an oil water separator were located at Station L from at least 1954/1957 until the parcels were sold. For further details on PGE's stormwater control system at Station L, see the response to Questions 13i and 18. For other underground utilities and pipelines located at Station L, see the responses to Questions 13b and 13c. There were 15 USTs located at Station L during PGE's historical ownership and operations (early 1900s to 1986/1995/2005): • There were five USTs (EY-01 through EY-05) located northeast of the Station L power plant (Parcel C). To the best of PGE's knowledge, after reasonable inquiry, these USTs were installed in 1910/1911 with the construction of the Station L power plant. • There were eight USTs (EY-07 through EY-15) in the Market Street Garage area (Parcel A). To the best of PGE's knowledge, after reasonable inquiry, these USTs were installed sometime prior to 1945 when the garage service station was constructed. • There was a single UST (EY-06) located adjacent to the helicopter pad fueling station (Parcel D). This UST was installed in 1983 under a use permit granted by PGE to Emanuel Hospital (Life Flight). See the attached documents (Q13j_1958-02-21 Oil Storage Tank Details.pdf, Q13j_1958-04-23 Oil Storage Tank Mech Details.pdf, Q13j_1966-10-24 General Layout Fuel Storage Area.pdf, Q13j_1983-06-27 Aviation Fuel System.pdf, and Q13j_1988-10-10 UST Dewatering Pipe Route Plan.pdf), the document (Q13k_1910-1912 Site Construction Figures.pdf) attached in response to Question 13k, and the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15.	Question 13 Attachments Q13j_1958-02-21 Oil Storage Tank Details.pdf Q13j_1958-04-23 Oil Storage Tank Mech Details.pdf Q13j_1966-10-24 General Layout Fuel Storage Area.pdf Q13j_1983-06-27 Aviation Fuel System.pdf Q13j_1988-10-10 UST Dewatering Pipe Route Plan.pdf Q13k_1910-1912 Site Construction Figures.pdf Also see Question 15 Attachment Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf

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	To the best of PGE's knowledge, after reasonable inquiry, these underground structures were removed during PGE's Station L investigation and remediation, by OMSI (who acquired Parcels A-F in 1986 and Parcel I in 2005), or by Life Flight (UST EY-06 only).	
k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the Property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;	To the best of PGE's knowledge, after reasonable inquiry, Station L has undergone a series of modifications during PGE's historical ownership and operations (early 1900s to 1986/1995/2005). Major modifications included: • Approximately 1901 – Construction of the Station F power plant • Approximately 1909 – Construction of Store Room No. 1 • Approximately 1909 – Construction of non-oil wharfs/docks • 1910 – Construction of the Station L power plant and Lincoln Substation • 1910/1911 – Construction of an oil dock adjacent to the power plant • 1910/1911 – Hog fuel outdoor storage area • Sometime between 1911 and 1924 – Removal of the Station F power plant • Sometime between 1924 and 1945 – Removal of Store Room No. 1 • Sometime between 1924 and 1950 – Addition of a power house extension and second boiler room to the Station L power plant • Sometime prior to 1945 – Construction of the central division garage (Market Street garage), garage fueling station and system, PGE Station L office, filter house, pole operations building, machine shop, and electricians building • Sometime prior to 1950 – Construction of the welding shop • Approximately 1954/1957 – Installation of the Station L stormwater control system • 1954 – Acquired the planer building with the purchase of Parcel E • Approximately 1956 – Removal of the hog fuel outdoor pile • Approximately 1957 – Construction of a second oil dock south of the power plant and a tank farm, including a 96,690-barrel AST • Sometime prior to 1966 – Construction of the communication center, radio shop, microwave tower, mobile radio building, and sandblast shed • Sometime prior to 1966 – Removal of the non-oil wharfs/docks • Sometime between 1966 and 1975 – Construction of the EM&C storage building, public relations storage building, and the helicopter pad • Sometime between 1966 and 1975 – Removal of the pole operations building and electricians building • Approximately 1974 – Addition of the temporary analytical lab (two large, joined, mobile home-style structures) • 1976 – Removal of the temporary analytical lab • 1983 – Installation of a helicopter refueling system To the best of PGE's knowledge, after reasonable inquiry, all of the historical Station L structures were removed sometime between 1986 and 1994, unless otherwise noted above. During the PGE's site investigation and remedial activities at Station L (between 1986 and 1998), soil and sediment were excavated, see the response to Question 15 for further details. See the attached documents, the documents (Q10_Sanborn Maps-Northern.pdf and	Question 13 Attachments Q13k_1910-1912 Site Construction Figures.pdf Q13k_1910 Original Construction Data and Photos.pdf Q13k_1926-11-08 Market Street Garage bldg docs.pdf Q13k_1960-05-20-Abandoned Equipment.pdf Q13k_1962-1964 Market St Garage Alt Memos.pdf Q13k_1963-1971 Market St Garage Gas Memos.pdf Q13k_1963-10-23 Pole Yards Figure.pdf Q13k_1964-01-20 Comm Lab & Radio Tower Found.pdf Q13k_1965-01-15 Comm Lab and Radio Tower.pdf Q13k_1965-03-11 East Marquam Interchange.pdf Q13k_1970 Radio Lab Building Memo.pdf Q13k_1974-07-03 Trans oil storage Tank Foundation.pdf Q13k_1978-06-15 General Map of Vicinity.pdf Q13k_1987-07-30_RR Track Realignment.pdf Q13k_1989-12-11 OMSI Riprap Sketch.pdf Q13k_Radio Com Tower.pdf Q13k_Station L Photo History.pdf Also see Question 10 Attachments Q10_Sanborn Maps-Northern.pdf Q10_Sanborn Maps-Southern.pdf Also see Question 15 Attachments Q15_1984-01-27 SERA_Phase I.pdf Q15_1987-07-06 HC Vol PCB Cleanup Plan.pdf Q15_1988-02-29 HC RAP Vol I.pdf Q15_1991-1992 CH2M Helipad Cleanup Documents.pdf Q15_1994-08-09 EPA Site Investigation Report.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf

EPA Question	Response	Records/Information Available
	Q10_Sanborn Maps-Southern.pdf) attached in response to Question 10, the Station L historical/background information in the reports (Q15_1984-01-27 SERA_Phase I.pdf, Q15_1987-07-06 HC Vol PCB Cleanup Plan.pdf, Q15_1988-02-29 HC RAP Vol I.pdf, Q15_1991-1992 CH2M Helipad Cleanup Documents.pdf, Q15_1994-08-09 EPA Site Investigation Report.pdf, and Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. Also see the response to Question 5g and the response to Questions 13b through 13j. To the best of PGE's knowledge, after reasonable inquiry, PGE does not have any future major additions/demolitions planned because the company no longer owns the Station L property and has fulfilled its remediation obligations.	
l. all maps and drawings of the Property in your possession; and	Please refer to the attached figures and site photographs. Also see the figures attached in response to other questions herein.	Question 13 Attachments Q13l_1904-1945 Willamette River Figures.pdf Q13l_Figure of North End.pdf Q13l_Sta L Excavator Photos.pdf
m. all aerial photographs of the Property in your possession.	The attached document (Q13m_Aerial Photos 1945-1986.pdf) provides aerial photographs of Station L in 1945, 1966, and 1980s. Also see the attached undated aerial (Q13m_Oblique Aerial.pdf). Aerial photographs are available at Google Maps, Google Earth, and Portland Maps. The attached document (Q13m_Aerial Photos 2001-2007.pdf) provides Portland Maps aerial photographs from 2001 to 2007. Also see the aerial photographs included in the documents attached in response to other questions herein.	Question 13 Attachments Q13m_Aerial Photos 1945-1986.pdf Q13m_Oblique Aerial.pdf Q13m_Aerial Photos 2001-2007.pdf
n. all information requested in (a) through (m) above regarding, but not limited to, the following:		
i. the Portland General Electric Station L location on 1841 SE Water Ave;	Responses 13a through 13m are applicable to Station L, which includes the historical 1841 SE Water Avenue address.	
ii. the Portland General Electric Station E location on 2635 NW Front Ave;	See the separate 104(e) response for Station E.	
iii. the Portland General Electric Station N location on 6616 N Lombard St.;	See the separate 104(e) response for Station N.	
14. For Properties adjacent to the Willamette River, provide specific	The legal riverward property line is the Ordinary Low Water line as established by the Oregon Legislature passing an act, which granted the riparian owners along the Willamette River tidelands or submersible lands (between ordinary high and low water) adjacent to an upland	See Question 4 Attachment Q04_Plats.pdf

EPA Question	Response	Records/Information Available
information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.	owner's patent. This grant was repealed October 18, 1878. Thus riparian owners of land patented prior to 18 October 1878 were granted the adjacent abutting tidelands. Since PGE's riparian properties are held by an early patent, the boundary between private and public ownership for the PGE former and current properties is the Ordinary Low Water line. Between 1988 and 1990, the DSL investigated the ownership of the submerged and submersible land adjacent to Station L. As a result of this investigation, the following resulted: • On 15 August 1990, PGE issued a quitclaim deed to the DSL for the lands lying below the line of ordinary low water as it existed in 1990, which is identified as 'M' adjacent to Parcel I in the plat (Q04_Plats.pdf) attached in response to Question 4. PGE thereby relinguished any claim it may have had on the submerged lands adjacent to Parcel I. • On 29 August 1990, the DSL issued PGE a quitclaim deed on the previously submerged lands lying above the ordinary low water line as it existed in 1990, which is identified as 'L' within Parcel I in the plat (Q04_Plats.pdf) attached in response to Question 4. The DSL thereby relinquished any claim the state may have had on the previously submerged lands on Parcel I. For further details, see the response and documents (Q07_1990-08-15 DSL QuitClaim Deeds.pdf and Q07_1990-05-01 DSL Ownership Investigation.pdf) attached for Question 7.	Also see Question 7 Attachments Q07_1990-08-15 DSL QuitClaim Deeds.pdf Q07_1990-05-01 DSL Ownership Investigation.pdf
15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.	To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the reports, information, or data PGE has related to soil, water (ground and surface), or air quality and geology/hydrogeology at Station L: • In 1957, Dames & Moore conducted a foundation investigation for the then-proposed oil tank farm at Station L, including determination of soil conditions. See the attached document (Q15_1957-04-05 Foundation Invst of Oil Strg Tanks.pdf). To the best of PGE's knowledge, after reasonable inquiry, this oil tank farm, including an AST, was installed at Station L in approximately 1957/1958. After retirement of the Station L power plant in 1975, PGE evaluated several alternatives for the future development of Station L, including donation of the property. • In 1982, PGE performed an internal health and safety evaluation of the Welding Shop; see the attached documents (Q15_1982 Station L HS Weld Shop.pdf and Q15_1982 Lab Results.pdf). • In 1983, PGE performed an internal hazardous/toxic substance inventory at Station L, which identified ACM. See the attached document (Q15_1983-10-25 Sta L Toxic-Haz Substance Memo.pdf).	Question 15 Attachments Reports Q15_1957-04-05 Foundation Invst of Oil Strg Tanks.pdf Q15_1982 Station L HS Weld Shop.pdf Q15_1983-10-25 Sta L Toxic-Haz Substance Memo.pdf Q15_1984-01-27 SERA_Phase I.pdf Q15_1984-04-00 SERA Prelim Geotech Eng Invst.pdf Q15_1986-05-20 Daly_Envi Sound Report.pdf Q15_1986-06-23 GRI Inclinometer Report.pdf Q15_1986-07-31 OMNI_Sampling Report.pdf Q15_1986-09-15 Asbestos Air Sampling.pdf Q15_1986-1988 UST Internal Memos.pdf Q15_1987-02-27 OMNI_Final Soils Invst Report.pdf Q15_1987-1988_OMNI Interim Reports 1-12.pdf Q15_1987-04-17_HC RAP & Soil-GW Scoping.pdf Q15_1987-07-06 OMNI Underwater Sed Samp.pdf Q15_1987-07-06 HC Vol PCB Cleanup Plan.pdf Q15_1987-07-02 Sta L Memo of Agency Meeting.pdf Q15_1987-07-13 HC_Phase II River Sed Asmt.pdf

EPA Question	Response	Records/Information Available
	• In 1984, several contractors developed a Station L Master Plan to evaluate the options for Station L development. As part of the Master Plan analysis phase, Foundation Sciences Inc performed soil and geotechnical engineering evaluations at Station L; see the attached documents (Q15_1984-01-27 SERA_Phase I.pdf and Q15_1984-04-00 SERA Prelim Geotech Eng Invst.pdf). • In 1986, Daly Engineering Company conducted an ambient noise/sound study at Station L; see the attached document (Q15_1986-05-20 Daly_Envi Sound Report.pdf). • In 1986, Geotechnical Resources Inc monitored the three inclinometers which were installed in 1984 by Foundation Sciences Inc during the Master Plan analysis; see the attached document (Q15_1986-06-23 GRI Inclinometer Report.pdf). PGE decided to donate the northern 18 acres of Station L (Parcels A through F) to OMSI. Title for this portion of Station L passed from PGE to OMSI on 31 December 1986. Because PGE had stored electrical equipment containing PCBs in some areas of Station L, PGE retained responsibility for cleaning up PCB contamination and for the removal of all ACM on the donated land as a contingency of the donation. To fulfill this voluntary obligation, PGE embarked on an uplands investigation and cleanup program at Station L. • In July, September, and August 1986, OMNI collected environmental samples (soil, pavement, manhole/catch basin) at the Station L trench area. The samples were analyzed for PCBs. See the attached documents (Q15_1986-07-31 OMNI_Sampling Report.pdf, Q15_1986 Lab Results.pdf, and Q15_1987-02-27 OMNI_Final Soils Invst Report.pdf). • The soil testing at the trench area and near the turbine building identified areas of PCB contamination (≥50 ppm). PGE removed surface soil at locations of elevated PCB concentrations in 1986, resulting in the disposal of approximately 430 tons of soil, rock, and solid waste cleanup material between October and November 1986 at the Arlington Landfill; see the document (Q21c_1986-1987 TSCA HW Manifests.pdf) attached in response to Question 21c. • In 1986/1987, ACM was removed from the old transformer storage yard. During the asbestos removal, HMS conducted asbestos air monitoring; see the attached document (Q15_1986-09-15 Asbestos Air Sampling.pdf). The results of the monitoring were below the OSHA limit. The approximately 8-9 cubic yards of ACM were disposed of at the Circle C Landfill in 1987; see the documents (Q21c_1987-03-12 Bill of Lading.pdf and Q21c_1987-08-19 Bill of Lading.pdf) attached in response to Question 21c. • Between January and May 1987, OMNI collected soil and material samples from the	Q15_1987-08-11 EnvTox Rev of EPA Risk Criteria.pdf Q15_1987-1988_HC correspondences to PGE-OMSI.pdf Q15_1987-12-17 HC Concept WP-River Sediment.pdf Q15_1987-12-31 HC Removal of PCB Soils & DR.pdf Q15_1988-01-21 HC Soil-GW Quality Assessment.pdf Q15_1988-01-29 HC Offshore Sediment Sampling.pdf Q15_1988-02-24_HC Eval and RAP Propsal-Scoping.pdf Q15_1988-02-29 HC RAP Vol I.pdf Q15_1988-02-29 HC RAP Vol II.pdf Q15_1988-03-28 HC Sediment Quality.pdf Q15_1988-04-13 Pipeline Dredging.pdf Q15_1988-04-19_HC to PGE RE-Sediment in RAP.pdf Q15_1988-05-09 SweetEdwards_GWReport.pdf Q15_1988-06-09 DEQ Preliminary Site Assessment.pdf Q15_1988-06-17 D&M_PCB River Sed Alternatives.pdf Q15_1988-10-10_OMNI Sampling.pdf Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf Q15_1989-01-09 Tech Spec for Asbestos Abatement.pdf Q15_1989-08-07 CH2MH RAP Modifications.pdf Q15_1989-08-08 CH2MH Willamette River Sampling.pdf Q15_1989-11-00 CH2MH_Phase III Revised WP.pdf Q15_1989-11-00 CH2MH Final RAP.pdf Q15_1989 SOG Documents.pdf Q15_1989 FredDevine Pre-Cap Inspection.pdf Q15_1989-1991 SEUA Soil Sampling Docs.pdf Q15_1990-02-06 Jan - Feb. Highlights.pdf Q15_1990-02-28 Additional Phase 3 Areas.pdf Q15_1990-03-02 Feb. Highlights.pdf Q15_1990-03-30 ESD Activities.pdf Q15_1990-04-23 PGE Sediment Test Results.pdf Q15_1990-05-11 Machine Shop Summary.pdf Q15_1990-06 Phase 3 Assessment Level WP.pdf Q15_1990-07-18 Reidel Sediment Work Clarif.pdf Q15_1990-07 CH2M_PCB River Sed Design Rept.pdf Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf Q15_1991-06-10 REA Final Rept Pole Yard Aeration.pdf Q15_1991-07-11 Daily Log Data.pdf Q15_1991-1992 CH2M Helipad Cleanup Documents.pdf Q15_1991&1994 CH2MHill Cap Inspections.pdf Q15_1992-07 CH2M_Phase III_GW Invest WP_Final.pdf Q15_1993-12-20 Conceptual Design Air Sprg Sys.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf

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	river shoreline, the turbine room (exterior, interior, and platform), Lincoln Substation (interior), EM&C storage building (interior), machine shop, underground tank area, X and Y Areas, the eastern boarder of Stephens Substation, the service road, the conveyer drive system, and the tank farm. The samples were analyzed for PCBs. See the 1987 Interim Report Numbers 1-3 within the attached document (Q15_1987-1988_OMNI Interim Reports 1-12.pdf). • The soil testing conducted between January and May 1987, identified areas of PCB contamination (≥50 ppm), including several upland locations (e.g., X and Y Areas, the service road, and the turbine building), as well as at the river shoreline adjacent to the turbine room. See the 1987 lab results in the attached document (Q15_1988-1989 Lab Results.pdf). River sediment contamination was not suspected at Station L prior to the initial uplands site investigation. During the initial uplands investigation, it became apparent that PCB-contaminated materials may have migrated into the river, west of the turbine building. In addition to further uplands investigations, PGE sampled and analyzed river water and sediment. After detecting PCBs in the sediment, PGE collected additional sediment samples to determine the extent of contamination and found an approximately 80- by 120-foot area containing PCB concentrations ranging from <1 to 286 ppm. Based on the nature and extent of PCB-contamination of sediment, it appeared that the PCBs came from the edge of the river next to the turbine building. A review of historical PGE records showed that a transformer on the west side of the turbine building failed in April 1971 and released askarel oil (>500 ppm PCBs). • In June 1987, OMNI collected further environmental samples (soil, rock, asphalt, and other materials) in the uplands area of Station L, as well as sediment samples in the river adjacent to the turbine building; see the 1987 Interim Report 4 within the attached document (Q15_1987-1988_OMNI Interim Reports 1-12.pdf) and attached sediment document (Q15_1987-07-06 OMNI Underwater Sed Samp.pdf). • For further information on the 1971 release, see the response and documents (Q62_1987-06-15 Memo on Historical PCB.pdf, Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf, and Q62_1987-06-24_PGE Phone Memo_1971 spill.pdf) attached for Question 62. In June 1987, PGE entered the Oregon DEQ's Voluntary Cleanup Program. PGE began soil, sediment, surface water, and groundwater investigations under the cleanup program. In March 1988, PGE submitted a RAP to the Oregon DEQ for remediation of PCB-contaminated sediments next to the turbine building. The Oregon DEQ requested that PGE enter into a consent order covering the entire Station L facility before PGE began its proposed remedial action. • Between July 1987 and May 1988, OMNI conducted further environmental and confirmatory sampling at Station L; see the Interim Reports 5-12 within the attached document (Q15_1987-1988_OMNI Interim Reports 1-12.pdf). Also see the attached	Q15_1994-08-09 EPA Site Investigation Report.pdf Q15_1994-1998 CH2M_Air Sparging Progress Reports.pdf Q15_1994 AS-1 ASRS Construction Log.pdf Q15_1996 CH2MHill Cap Inspection.pdf Q15_1998-07-23 Well Abandonment Plan.pdf Q15_1990-03-28_SRH_UST & Soil Helipad Area.pdf Q15_2001&2006 Bridgewater Cap Inspections.pdf Lab Results Q15_1982 Lab Results.pdf Q15_1986 Lab Results.pdf Q15_1987 Lab Results.pdf Q15_1988-1989 Lab Results.pdf Q15_1989-05-22 Hazcon Asbestos Data.pdf Q15_1990-1994 Invest Lab Results.pdf Q15_1994-1995 GW Air Sparging Results.pdf Q15_1995-08-29_Asbestos Lab Results.pdf Photographs Q15_1987-10-09_Photos - Market Street Garage.pdf Q15_1989-03-15 Photos.pdf Q15_1989-09-06 Photos - Asphalt Sampling.pdf Q15_1989-1991 Photos_CH2MHill_Air Sprg Vol1of3.pdf Q15_1990-07-30 Photos - CH2MHill - Phase II.pdf Q15_1990-08 Photos_CH2MHill_Air Sprg Vol2of3.pdf Q15_1990 Photos_CH2MHill_Air Sprg Vol3of3.pdf Q15_1991-10-14 Photos - CH2MHill.pdf Q15_1991-10-18 Photos - CH2MHill.pdf Q15_1991-11-18 Photos - CH2MHill.pdf Q15_1992-01-10 Photos - CH2MHill.pdf Q15_1993-12-27 Photos - CH2MHill.pdf Q15_Photos - CH2MHill - Phase 3.pdf Q15_CH2MHill Sediment Remediation Photos.pdf Videos Q15_2001-12-14 Inspection Disc 1.wmv Q15_2001-12-14 Inspection Disc 2.wmv Q15_2006 OMSI Shore Survey.wmv Also see Question 4 Attachments Q04_2006 Plats.pdf Q04_Plats.pdf

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	internal PGE memo concerning an agency meeting on shoreline sampling (Q15_1987-07-02 Sta L Memo of Agency Meeting.pdf). • In July 1987, Hart Crowser completed the Voluntary PCB Cleanup Plan; see the attached document (Q15_1987-07-06 HC Vol PCB Cleanup Plan.pdf). Also see the attached associated proposal and scoping document (Q15_1987-04-17_HC RAP & Soil-GW Scoping.pdf). • Between August 1987 and March 1988, Hart Crower completed several other Station L evaluations and reports; see the attached documents (Q15_1987-07-13 HC_Phase II River Sed Asmt.pdf, Q15_1987-08-11 EnvTox Rev of EPA Risk Criteria.pdf, Q15_1987-12-17 HC Concept WP-River Sediment.pdf, Q15_1987-1988_HC correspondences to PGE-OMSI.pdf, Q15_1988-01-21 HC Soil-GW Quality Assessment.pdf, Q15_1988-01-29 HC Offshore Sediment Sampling.pdf, and Q15_1988-03-28 HC Sediment Quality.pdf). • In December 1987, Hart Crowser completed a report on the removal of PCB-containing soils at Station L between June and November 1987; see the attached document (Q15_1987-12-31 HC Removal of PCB Soils & DR.pdf). A total of 2,486.9 tons of soil were removed from X Area, Y Area, Stephens Substation (eastern border), the Underground Tank Area, the service road, Conveyor Drive Areas, the Sumps, the Poulsen Building, and the Turbine Area. The removed soil was disposed of at Arlington Landfill; see the manifests (Q21c_1986-1987 TSCA HW Manifests.pdf) attached in response to Question 21c. • In February 1988, Hart Crowser completed the RAP; see the attached documents (Q15_1988-02-29 HC RAP Vol I.pdf and Q15_1988-02-29 HC RAP Vol II.pdf). Also see the attached associated documents (Q15_1988-02-24_HC Eval and RAP Propsal-Scoping.pdf, Q15_1988-04-13 Pipeline Dredging.pdf, and Q15_1988-04-19 HC to PGE RE-Sediment in RAP.pdf). • In May 1988, Sweet Edwards completed a report on the 1987 groundwater investigations at Station L; see the attached document (Q15_1988-05-09 SweetEdwards_GWReport.pdf). • In June 1988, the Oregon DEQ completed a preliminary assessment of Station L, concluding that further investigation of the site was warranted; see the attached document (Q15_1988-06-09 DEQ Preliminary Site Assessment.pdf). • In June 1988, Dames & Moore completed a report on the remediation alternatives for the PCB-contaminated river sediments adjacent to the turbine building; see the attached document (Q15_1988-06-17 D&M_PCB River Sed Alternatives.pdf). In August 1988, PGE entered into a three-phase consent order (DEQ No. ECSR-NWR-88-02) to	Also see Question 19 Attachements Q19_1975 SPCC.pdf Q19_1980 SPCC.pdf Also see all Question 21 Attachments Also see all Question 50 Attachments Also see all Question 62 Attachments

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	identify the nature and extent of hazardous substances over the entire Station L property (Parcels A through I) and Stephens Substation (addressed in a separate 104(e) response); see the document (Q50_1988-08-03 DEQ Order of Consent.pdf) attached in response to Question 50. Phase I investigated/remediated the PCB contamination of the Willamette River shoreline (above the ordinary low water line) adjacent to the turbine building, Phase II investigated/remediated the PCB contamination of the Willamette River underwater sediments (below the ordinary low water line), and Phase III investigated/remediated hazardous substances contamination (if any) of groundwater, surface water, structures, soils, and other Station L sediments. In 1989, under the OMSI donation contingency, PGE removed the remaining ACM from Station L; see the attached documents (Q15_1989-01-09 Tech Spec for Asbestos Abatement.pdf and Q15_1989-05-22 Hazcon Asbestos Data.pdf). Approximately 930 tons of ACM were removed and disposed of at the St Johns Landfill; see the documents (Q21c_1989-10 St. Johns Landfill Receipts.pdf and Q21c_1989 St. Johns Landfill Receipts.pdf) attached in response to Question 21. Treated (filtered) ACM-contaminated waste water, generated from the washing equipment, building interiors, and personnel, was discharged to the municipal sanitary sewer under a City of Portland special discharge permit; see the documents (Q52_1989-06-14 Special Permit Request.pdf, Q52_1989-06-30 Wastewater Discharge Permit.pdf, Q52_1989-09-22 Permit Modification.pdf, Q52_1989-09-25 Permit Modification.pdf, and Q52_1989-10-05 Asbestos Permit Modification.pdf) attached in response to Question 52. During the discharges, asbestos-containing water was inadvertently discharged to the sewer due to an apparent failure in the filtration system. For further details, see the responses to Questions 13g, 21, and 51. In February 1990, the Oregon DEQ selected the hybrid low-volume dredging and capping sediment remediation alternative; see the Phase II ROD (Q50_1990-02-26 Phase II ROD.pdf) attached in response to Question 50. During the Station L Phase I, II, and III investigations (1988-1994), many reports, documents, and correspondence were prepared by PGE or its consultants documenting the progress and completion of the Station L investigations and remediation; see the attached documents (Q15_1989-08-07 CH2MH RAP Modifications.pdf, Q15_1989-08-08 CH2MH Willamette River Sampling.pdf, Q15_1988-10-10_OMNI Sampling.pdf, Q15_1989-11-00 CH2MH_Phase III Revised WP.pdf, Q15_1989 SOG Documents.pdf, Q15_1989 FredDevine Pre-Cap Inspection.pdf, Q15_1989-1991 SEUA Soil Sampling Docs.pdf, Q15_1990-02-06 Jan - Feb. Highlights.pdf, Q15_1990-02-28 Additional Phase 3 Areas.pdf, Q15_1990-03-02 Feb. Highlights.pdf, Q15_1990-03-30 ESD Activities.pdf, Q15_1990-04-23 PGE Sediment Test Results.pdf, Q15_1990-05-11 Machine Shop Summary.pdf, Q15_1990-06 Phase 3 Assessment Level WP.pdf, Q15_1990-07-18 Reidel Sediment Work Clarif.pdf, Q15_1990-07 CH2M_PCB River Sed Design Rept.pdf, Q15_1991-06-10 REA Final Rept Pole Yard Aeration.pdf, Q15_1991-07-11 Daily Log Data.pdf, Q15_1991-1992 CH2M Helipad Cleanup Documents.pdf, Q15_1992-07 CH2M_Phase III_GW Invest WP_Final.pdf, and Q15_1993-12-20 Conceptual Design Air Sprg Sys.pdf). Also see the 1988-1993 Station L Progress Reports (Q50_1988-1993 PGE Progress Reports.pdf) attached in response to Question 50, which were sent to the Oregon DEQ. Also see the	

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	attached lab results (Q15_1986-1988 UST Internal Memos.pdf, Q15_1987 Lab Results.pdf, Q15_1988-1989 Lab Results.pdf, and Q15_1990-1994 Invest Lab Results.pdf). In addition, the attached document (Q15_1990-03-28_SRH_UST & Soil Helipad Area.pdf) is the 1990 UST Removal and Soil Sampling Report: Helicopter Refueling Station, which was completed by SRH for Life Flight (PGE lessee). Notable Station L investigation reports include: • The 1988 Phase I Completion Report: Removal of PCBs from Area A; see the attached document (Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf). The area was remediated to an average concentration of 1 ppm PCBs. A total of approximately 80 tons of soil/sediment were excavated. A total of approximately 174.3 tons of soil/sediment, debris, and concrete were removed and disposed of at the Envirosafe Services of Idaho Inc landfill. • The 1989 Final RAP; see the attached document (Q15_1989-11-00 CH2MH Final RAP.pdf). • The 1991 Phase II Final Report: Station L PCB-Contaminated River Sediment Remediation; see the attached document (Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf). The river was remediated to an average concentration of 1 ppm PCBs. A total of 535,700 gallons of water were processed with the sediment dewatering and water treatment facility and then discharged back into the river. A total of 17 tons of sediment and miscellaneous debris were removed. The 17 tons of sediment/debris and 23.5 tons of carbon and mixed media were disposed of at the Arlington Landfill. The remaining sediment in the affected was covered with a 6-foot thick cap of sand, gravel, and rip rap. A post-construction sediment cap inspection was conducted in 1990. • The 1994 Phase III Revised Final Site Investigation Report for Station L; see the attached document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf). The soil was remediated to approximately 1 ppm PCBs. In addition, the majority of soil was also remediated for other chemicals to levels below background and/or less than regulatory screening levels. More than 10,000 tons of PCB-containing soil/materials and more than 3,000 tons of soils/materials containing non-PCB contaminants (i.e., petroleum hydrocarbons and metals) were removed from Station L and disposed of at appropriate facilities. For further details, see the response and documents to Question 21. The groundwater beneath Parcel A had BTEX concentrations above applicable screening criteria. Therefore, an air sparging remediation system was installed at Parcel A in 1994 to reduce the BTEX concentrations in the groundwater. The air sparging remediation was planned to continue until the groundwater concentrations were below screening criteria or the air sparging remediation system had reached its threshold of effectiveness. See the attached documents	

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	(Q15_1993-12-20 Conceptual Design Air Sprg Sys.pd and Q15_1994 AS-1 ASRS Construction Log.pdf, and Q15_1994-1995 GW Air Sparging Results.pdf), as well as the documents (Q50_1993-07-23 CH2MHill to DEQ.pdf, Q50_1993-08-09 DEQ to CH2MHill.pdf, Q50_1994-02-23 CH2MHill-Brown to DEQ-Burnet.pdf, Q50_1994-04-13 CH2MHill-Wuttig to DEQ-Burton.pdf, Q50_1994-05-12 CH2MHill-Wuttig to WRD-Carter.pdf, and Q50_1994-06-20 CH2MHill-Wuttig to WRD-Carter.pdf) attached in response to Question 50. Under Phase I and Phase II consent order requirements, PGE completed the remediation of PCB-contaminated river sediments in 1990. In April 1991, the Oregon DEQ issued a certificate of completion indicating that PGE had met the Phase I and Phase II consent order requirements; see the document (Q50_1991-04-17 Cert of Completion for Phase I & II.pdf) attached in response to Question 50. CH2MHill, on behalf of PGE, conducted yearly inspections of the sediment cap from 1991 to 1994; see the attached document (Q15_1991&1994 CH2MHill Cap Inspections.pdf), which provides the available 1991 and 1994 inspection reports. To the best of PGE's knowledge after reasonable inquiry, PGE has not been able to locate copies of the 1992 and 1993 inspection reports. The Oregon DEQ then approved an inspection schedule of every 5 years or after major flood events, whichever occurred first. Under Phase III consent order requirements, PGE completed the remediation of the uplands portion of Station L and the investigation of groundwater in 1994. In June 1991, PGE received a "NFA" determination for the USTs at Station L; see the document (Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf) attached in response to Question 50. In November 1993, the Oregon DEQ issued an Order of Completion for Station L Phase III; see the document (Q50_1993-11-16 DEQ Order of Completion.pdf) attached in response to Question 50. In September 1994, PGE received a final "NFA" for Station L in Oregon DEQ's Station L Phase III ROD; see the document (Q50_1994-09-26 Phase III ROD.pdf) attached in response to Question 50. The USEPA completed a Site Investigation of Station L in August 1994; see the attached document (Q15_1994-08-09 EPA Site Investigation Report.pdf). Based on their site investigation and other pertinent information, the EPA found it appropriate to refer to state authority for Station L and did not anticipate further investigation for Station L under the Federal Superfund Program. In 1995, PGE removed the dock and dolphins adjacent to Parcel I, including ACM dock steam piping, prior to selling this parcel to KPTV that same year; see the attached laboratory results (Q15_1995-08-29_Asbestos Lab Results.pdf). In 1996, the sediment cap was inspected by CH2MHill following a flood event; see the attached document (Q15_1996 CH2MHill Cap Inspection.pdf). The sediment cap was then inspected in 2001 and 2006 by Bridgewater Group, on behalf of PGE; see the attached inspection report (Q15_2001&2006 Bridgewater Cap Inspections.pdf) and the attached 2001 and 2006 sediment cap inspection videos (Q15_2001-12-14 Inspection Disc 1.wmv, Q15_2001-12-14 Inspection Disc 2.wmv, and Q15_2006 OMSI Shore Survey.wmv). The Station L cap has remained stable and there is no evidence of erosion. The cap is planned for re-inspection in 2011.	

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	PGE continued to monitor the groundwater beneath Parcel A at varying intervals; see the attached progress reports (Q15_1994-1998 CH2M_Air Sparging Progress Reports.pdf). Due to the decline of BTEX concentrations in groundwater beneath Parcel A and because the air sparging remediation system had reached its threshold of effectiveness, the air sparging remediation system was abandoned in January 1998, including the abandonment of the monitoring wells and process wells. See the attached document (Q15_1998-07-23 Well Abandonment Plan.pdf), as well as the documents (Q50_1997-12-29 DEQ-Kiernan to PGE-Norton.pdf, Q50_1998-01-16 PGE-Norton to DEQ-Kiernan.pdf, and Q50_1998-01-22 DEQ-Kiernan to PGE-Norton.pdf) attached in response to Question 50. Photographs taken during the remedial activities at Station L are attached (Q15_1987-10-09_Photos - Market Street Garage.pdf, Q15_1989-03-15 Photos.pdf, Q15_1989-09-06 Photos - Asphalt Sampling.pdf, Q15_1989-1991 Photos_CH2MHill_Air Sprg Vol1of3.pdf, Q15_1990-07-30 Photos - CH2MHill - Phase II.pdf, Q15_1990-08 Photos_CH2MHill_Air Sprg Vol2of3.pdf, Q15_1990 Photos_CH2MHill_Air Sprg Vol3of3.pdf, Q15_1991-10-14 Photos - CH2MHill.pdf, Q15_1991-10-18 Photos - CH2MHill.pdf, Q15_1991-11-18 Photos - CH2MHill.pdf, Q15_1992-01-10 Photos - CH2MHill.pdf, Q15_1993-12-27 Photos - CH2MHill.pdf, Q15_Photos - CH2MHill - Phase 3.pdf, and Q15_CH2MHill Sediment Remediation Photos.pdf). The SPCC Plans (Q19_1975 SPCC.pdf and Q19_1980 SPCC.pdf), attached in response to Question 19, briefly describe topography and soil conditions at Station L Substation. For information regarding the disposal of wastes and materials, see the response to Question 21. Also see the plats (Q04_2006 Plats.pdf and Q04_Plats.pdf) attached in response to Question 4, the response and documents attached for Question 15, the response and documents attached for Question 50, and the response and documents attached for Question 62.	
16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:	To the best of PGE's knowledge, after reasonable inquiry, there were no landfills, surface impoundments, or waste lagoons at Station L. However, materials, surplus (used) and obsolete equipment, and waste have been managed, stored, and/or treated at the site, see response to below, as well as the response to Question 13g.	
a. a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to	To the best of PGE's knowledge, after reasonable inquiry, the following summarizes PGE's historical material and waste storage areas at Station L: <u>Station F Power Plant</u>	See Question 10 Attachments Q10_Sanborn Maps-Northern.pdf Q10_Sanborn Maps-Southern.pdf

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scale, if possible, and clearly indicate the location and size of all past and present units/areas; b. dated aerial photograph of the site showing each unit/area; c. the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area; d. the dates that the unit/area was in use; e. the purpose and past usage (e.g., storage, spill containment, etc.); f. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area and; g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.	PGE operated the Station F power plant in Parcel D from approximately 1901 to 1911. • Two conical cinder collectors stored cinder prior to disposal. • A machine shop (blacksmith) stored blacksmith tools/equipment. • A fuel sawdust shed and a sawdust and shavings bunker stored sawdust fuel. <u>Station L Power Plant and Ancillary Facilities/Operations</u> PGE operated the Station L power plant in Parcel C from approximately 1911 to 1975 (placed in "cold" standby in 1965 and formally retired in 1975). • Maintenance materials (e.g., oils, solvents/degreasers, denatured alcohol, lubricating grease, hydraulic fluid, and paint) were likely stored at the Station L power plant during its manned operation. • Hog Fuel Storage - From 1910/1911 to approximately 1956, an outdoor hog fuel storage pile was located on Parcels A and E with associated conveyors. It had a storage capacity of 50,000 units of hog fuel at 200 cubic feet per unit. In addition, there was a sawdust & shavings bunker with associated conveyors south of the power plant until sometime prior to 1950, when the bunker was removed but the conveyor drive house (conveyor engines) remained. • Fuel Oil Storage – From 1910/1911 to approximately 1975, there were five USTs (EY-01 through EY-05) located in Parcel C northeast of the Station L power plant. EY-01 stored diesel fuel, EY-02 through EY-4 stored fuel oil, and EY-05 stored gasoline. In approximately 1957, an oil tank farm was added to the southeast portion of Parcel H. Oil was piped to the 96,690-barrel AST in the tank farm via pipelines from barges docked at the oil dock. The oil dock was located adjacent to the northwest portion of Parcel I. <u>Other PGE Facilities</u> After retirement of the power plant in 1975, PGE continued to use Station L for its other PGE facilities, as well as for vehicle parking, equipment storage, overhead wire storage, pole storage, and equipment staging areas. PGE had operations at Station L through 1986 on Parcels A-H and through 2005 on Parcel I. • Store Room No. 1 – From approximately 1909 until to sometime between 1924 and 1945, Store Room No. 1 was located on Parcel A. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know what was stored in this building. • Central Division Garage (also known as Market Street Garage) - Used for maintenance and repair of PGE fleet vehicles from at least 1945 to 1986, the Central Division Garage was located in the northeastern area of Parcel A. Vehicle service	Also see all Question 13 Attachments Also see Question 15 Attachments Q15_1984-01-27 SERA_Phase I.pdf Q15_1987-07-06 HC Vol PCB Cleanup Plan.pdf Q15_1988-02-29 HC RAP Vol I.pdf Q15_1991-1992 CH2M Helipad Cleanup Documents.pdf Q15_1994-08-09 EPA Site Investigation Report.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf

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	materials (oil, antifreeze, etc), tires, paint, and tools were stored in the garage. • Garage Fueling Station – Used for fueling fleet vehicles from at least 1945 to 1986, the Garage Fueling Station was located on Parcel A, adjacent to the Central Division Garage. It included eight USTs: EY-07 stored fuel, EY-08 and EY-09 stored motor oil, EY-10 through EY-13 stored gasoline, and EY-14 and EY-15 stored used oil. • Electricians Building – From sometime prior to 1945 until sometime between 1966 and 1975, the electricians building was located on Parcel C. This building likely stored electrical tools and supplies (e.g., electrical wiring, cables, etc). • Machine Shop – Located in the southern area of Parcel B, the machine shop was used as a repair/modification facility for PGE equipment from at least 1945 to 1986. Tools/shop equipment spare parts were stored in the building. • Welding Shop – Located in the northern area of Parcel C, the welding shop was used as a metal repair/modification facility for PGE equipment from at least 1950 to prior to 1986. Welding tools/machines/equipment and metal were stored in the shop. • Communication Center – Located in the northwest area of Parcel A, the communication center was used as the base of operations for the PGE Communications Department from at least 1966 to 1986. It included a materials storage area and a garage bay for working on the communications system of company vehicles. Vehicle service materials (oil, antifreeze, etc) and tools were stored in the garage bay and/or the materials storage area. • Radio Shop – Located in the northwestern portion of Parcel B, the radio shop was used for repairing communications equipment and for spare parts storage from at least 1966 to 1986. • Sandblast Shed – Located in the southern area of Parcel B and adjacent to the machine shop, the sandblast shed was used for sandblasting and to store sandblast grit from sometime prior to 1966 to 1986. • EM&C Storage Building – Located in Parcel C, the EM&C storage building was used to store tools and materials for electrical maintenance and construction from sometime between 1966 and 1975 to 1986. These materials likely included, but may not be limited to, oil, denatured alcohol, solvents/degreasers, and lubricants. • Analytical Lab – Located in the southeast area of Parcel C, the analytical lab was used as the temporary quarters for the PGE analytical lab from approximately 1974 to 1976. It stored analytical chemicals and supplies. • Public Relations Storage Building – Located on Parcel I, the public relations storage	

EPA Question	Response	Records/Information Available
	building was used for the storage of public relations documents. From sometime between 1966 and 1975 to 1986. • HP Boiler Room Basement – Located on Parcel C, the HP boiler room basement was used as a waste drum storage area from approximately 1975 to 1986. • Helicopter Pad & Refueling System – The helicopter pad and refueling system were located on Parcel D. From 1983 to 1986, UST EY-06 was used to store Jet A fuel. • Tank Farm – Located on Parcel H, the tank farm, including the 96,690-barrel AST, was used to store waste oil prior to disposal during the remediation activities at Station L from approximately 1986 to 1994. • Scrap Steel Pile - Located in the southern area of Parcel B, adjacent to the machine shop, scrap steel was stored in a pile in this area from an unknown time up through 1986. • Chemical/Paint Storage Shed - Located in the southern area of Parcel B, adjacent to the machine shop, the chemical/paint storage shed was used to store chemicals and paint from sometime prior to 1966 until 1986. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know the precise chemicals stored in this building. • Lead-covered Cable Storage Area – Located in an asphalt-covered area located along the riverfront of Parcels A and B, this storage area was used to store cables (twisted copper wire wrapped in paper and covered with a lead-based shielding) on large wooden spools during an unknown period prior to 1964. • Utility Power Pole Storage Areas – Beginning sometime prior to 1945, the pole storage area was located in the eastern portion of Parcels A and B. Sometime prior to 1975, the pole storage area was relocated to the southern portion Parcel C/northern portion of Parcel E. From sometime between 1986 and 1995 to 2005, Parcel I was used for pole storage. The power poles may have been untreated cedar poles or poles pre-treated (by the manufacturer) with pentachlorophenol (PCP), creosote, or other common wood preservatives. • Electrical Equipment Storage Areas – Beginning sometime prior to 1966, the eastern area of Parcels E and I was used for transformer storage. By 1971, the transformer storage area had moved to the platform located at the southwest corner of the turbine building. From at least 1975 to 1986, transformers, capacitors, and switches were stored at Station L in the western area of Parcel I. • Other Equipment Storage and Vehicle Parking – From 1986 to 2005, Parcel I was used for equipment storage, overhead wire storage, and vehicle parking, in addition to its previously discussed pole storage use.	

EPA Question	Response	Records/Information Available
	• Other various smaller storage structures (e.g., mobile oil storage tanks and other small storage sheds) were located at Station L during the approximately 85 years of PGE (or PGE predecessor) operations on the property. The Station F power plant structures, Station L power plant structures, and other Station L facility structures were constructed of various materials (wood, concrete, and metal) in various sizes. See the Sanborn maps (Q10_Sanborn Maps-Northern.pdf and Q10_Sanborn Maps-Southern.pdf) attached in response to Question 10 and the response and documents attached for Question 13. Also see the Station L historical/background information and figures in the reports (Q15_1984-01-27 SERA_Phase I.pdf, Q15_1987-07-06 HC Vol PCB Cleanup Plan.pdf, Q15_1988-02-29 HC RAP Vol I.pdf, Q15_1991-1992 CH2M Helipad Cleanup Documents.pdf, Q15_1994-08-09 EPA Site Investigation Report.pdf, and Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. Sanitary Waste During PGE's ownership of Station L, sanitary waste was handled on site using septic tanks/cesspools. The document (Q13b_1986 Lower Sta L Figure.pdf) attached in response to Question 13b shows the location of a septic tank/cesspool in the southern portion of Parcel C in 1986, and the document (Q13b_1956-11-19 COP DPW Waterline.pdf) attached in response to Question 13b shows the location of the restrooms in the northern portion of Parcel C in 1956, which likely discharged to a septic tank/cesspool. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know where, when, or how the septic tanks/cesspools were emptied or maintained at Station L. Treatment/Control Devices and Areas To the best of PGE's knowledge, after reasonable inquiry, during PGE's historical Station L ownership and operation (early 1900s to 1986/1995/2005), other than remedial activities, the only treatment or control device at Station L was the stormwater control and secondary spill containment system (including an oil water separator), which is described in response to Questions 13i and 19. In order to fulfill the OMSI donation contingency and the Oregon DEQ Voluntary Cleanup consent order, PGE implemented the following treatment or control devices at Station L (Parcels A and C, which PGE had donated to OMSI in 1986); see the response to Question 13g for further details. The following summarizes these treatment and control devices: • In 1989, PGE treated (filtered) ACM-contaminated waste water generated from washing equipment, building interiors, and personnel during the removal of asbestos from Station L. The treated water was then discharged to the municipal sanitary sewer under a City of Portland special discharge permit. During the discharges, asbestos-containing water was inadvertently discharged to the sewer due to an apparent failure in the filtration system; see the response to Question 51.	

EPA Question	Response	Records/Information Available
	• In 1990, during the Phase II sediment remediation (removal), CH2MHill, on behalf of PGE, installed a sediment dewatering and water treatment facility adjacent to the Station L power plant and the river. The water removed from the sediment was treated (filtered) prior to discharge into the Willamette River under a temporary (two-month) NPDES permit. • In 1994, CH2MHill, on behalf of PGE, installed an air sparging remediation system to reduce the BTEX concentrations in the groundwater under Parcel A. Due to the decline of BTEX concentrations in groundwater and because the air sparging remediation system had reached its threshold of effectiveness, the air sparging remediation system was abandoned in January 1998. Approximately 2,650 cubic yards of petroleum-hydrocarbon contaminated soil from around the USTs in Parcel A were excavated and moved to the portion of Station L owned by PGE at that time (Parcel H and/or Parcel I). The soil was treated by spreading and aeration from June 1990 to March 1991. By February 1991, the total petroleum hydrocarbon concentration in the soil ranged from 24 to 46 ppm (below the 80 mg/kg cleanup level for TPH). For further details, see the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15.	
17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.	PGE no longer owns Station L. The majority of units/areas were no longer used and/or removed during the Station L remedial activities between 1986 and 1994, unless otherwise noted in response to Question 16. The removal of soil, sediment, and other materials during the remedial investigations at Station L (1986-1994) addressed the potential or actual releases of wastes/constituents from these units/areas. For further details, see the responses to Questions 15 and 16.	
18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:		
a. the location and nature of each sewer line, drain, ditch, or tributary;	Although the Stephen's Slough sewer line was located on Station L (northern portion of Parcel C), the property was not serviced by municipal sewer lines during PGE's ownership. During PGE's ownership of Station L, sanitary waste was handled on site by septic tanks/cesspools. The document (Q13b_1986 Lower Sta L Figure.pdf) attached in response to Question 13b shows the location of a septic tank/cesspool in the southern portion of Parcel C in 1986, and the document (Q13b_1956-11-19 COP DPW Waterline.pdf) attached in response to Question 13b shows the location of the restrooms in the northern portion of Parcel C in 1956, which likely discharged to a septic tank/cesspool. To the best of PGE's knowledge, after reasonable inquiry,	See Question 13 Attachments Q13b_1956-11-19 COP DPW Waterline.pdf Q13b_1986 Upper Sta L Figure.pdf Q13b_1986 Lower Sta L Figure.pdf Q13b_Mrkt St Garage Fencing & Drainage.pdf Q13i_1957-09-20_Fuel Oil Storage Storm Drain Profile.pdf Q13i_1975-10-07 EM&C Storage Yard Vicinity Map.pdf

EPA Question	Response	Records/Information Available
	PGE no longer knows where, when, or how the septic tanks/cesspools were emptied and maintained at Station L. To the best of PGE's knowledge, after reasonable inquiry, these units did not directly discharge to the Willamette River. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know the details of the site's stormwater drainage prior to the mid-1950s. From at least 1954 until the parcels were sold, stormwater falling on the north portion of Station L (Parcels A through D) that did not infiltrate into the ground or enter a drywell was drained by means of a series of catch basins and stormwater sewer lines, which emptied into the Willamette River. From at least 1957 until the parcels were sold, the stormwater falling on the southern portion of Station L (Parcels E through I) that did not infiltrate into the ground was drained by a catch basin collection system, including an oil water separator, which also emptied into the Willamette River. As noted in the document (Q13i_1991-12-19 Catchbasin.pdf) attached in response to Question 13i, the catch basin that had drained the northeastern portion of Parcel I was damaged during OMSI construction. As a result, from at least December 1991 until the property was sold, the stormwater in the northeastern portion of Parcel I infiltrated into the ground. The documents (Q13b_1986 Upper Sta L Figure.pdf, Q13b_1986 Lower Sta L Figure.pdf, and Q13b_Mrkt St Garage Fencing & Drainage.pdf) attached in response to Question 13b show the location of the Station L drainage features. Also see the documents from 1957 and 1975 (Q13i_1957-09-20_Fuel Oil Storage Storm Drain Profile.pdf and Q13i_1975-10-07 EM&C Storage Yard Vicinity Map.pdf) attached in response to Question 13i.	Q13i_1991-12-19 Catchbasin.pdf
b. the date of construction of each sewer line, drain, ditch, or tributary;	The stormwater system in the northern portion of Station L was constructed sometime around 1954, and sometime around 1957 in the southern portion of Station L.	
c. whether each sewer line, or drain was ever connected to a main trunk line;	To the best of PGE's knowledge, after reasonable inquiry, the Station L stormwater system was not connected to a main trunk line during PGE's ownership.	
d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and	To the best of PGE's knowledge, after reasonable inquiry, PGE is unaware of the discharge of any waste, material, or process residue from the Station L stormwater system to the Willamette River during PGE's ownership. Although metals and base-acid-neutral compounds were detected in sediments near river outfalls during the Phase III investigation, an upland source area assessment of the Station L storm drainage system did not identify any plausible onsite sources. For further details, see the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15.	See Question 15 Attachment Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf
e. any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:	To the best of PGE's knowledge, after reasonable inquiry, there were 11 outfalls to the Willamette River associated with Station L. To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the information regarding these outfalls, from northernmost to southernmost: • Three outfalls served Parcels A and C, discharging stormwater to the Willamette River; see the document (Q13b_1986 Upper Sta L Figure.pdf) attached in response to	See Question 13 Attachments Q13b_1986 Upper Sta L Figure.pdf Q13b_1986 Lower Sta L Figure.pdf Q13b_Mrkt St Garage Fencing & Drainage.pdf Also see Question 15 Attachment Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf

EPA Question	Response	Records/Information Available
i. the areas serviced by the outfalls; and ii. the type of outfall (i.e., stormwater or single facility operational).	Question 13b. • A fourth outfall served Stephens Substation and the PTC property (east of Station L); see the document (Q13b_1986 Upper Sta L Figure.pdf) attached in response to Question 13b. Stephens Substation is addressed in a separate 104(e) response. • A fifth outfall served the northern portion of Parcel C; it appears to have collected site stormwater and drainage from the Station L power plant HP boiler room and discharged water to the river; see the documents (Q13b_1986 Upper Sta L Figure.pdf and Q13b_Mrkt St Garage Fencing & Drainage.pdf) attached in response to Question 13b. • A sixth outfall served Parcel C, discharging stormwater to the river; see Figure 3-2 in the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. • A seventh outfall drained Parcels C and E, as well as offsite areas, to the Willamette River. It appears to have collected site stormwater and drainage from the Station L boiler room, as well as drainage from PTC property and from south of Station L (SE Caruthers), prior to discharging to the river; see Figure 3-2 in the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. • An eight outfall drained the portion of Parcel C immediately south of the Station L power plant, releasing stormwater to the river; see Figure 3-2 in the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. • A ninth outfall with an oil water separator served the southern portion of Parcel C, the southern portion of Parcel E, and the northern portion of Parcel I, releasing site stormwater to the river; see the document (Q13b_1986 Lower Sta L Figure.pdf) attached in response to Question 13b and Figure 3-2 in the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. • A tenth outfall appears to have released stormwater to the river; see Figure 3-2 in the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. • An eleventh outfall, located in the southwest corner of Parcel I, released stormwater from the sump in the southwest corner of the tank farm to the river; see the document (Q13b_1986 Upper Sta L Figure.pdf) attached in response to Question 13b.	

EPA Question	Response	Records/Information Available
19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans or Spill Plans developed for different operations during the Respondent's operation of each Property.	The Station L 1975 and 1980 SPCC Plans are attached. Please note that these SPCC plans postdate the operation of the Station L steam plant and were developed for the PGE operations at Station L from 1975-1986 (Market St Garage, equipment storage, etc). To the best of PGE's knowledge, after reasonable inquiry, PGE did not have SPCC plans for operations at Station L prior to 1975. The 1975 and 1980 SPCC Plans were utilized by PGE to ensure that Station L had adequate procedures to prevent oil spills, control measures in place to prevent a spill from reaching navigable waters, and countermeasures to contain, clean up, and mitigate the effects of an oil spill that reaches navigable waters. The spill containment system at the Station L, which includes the stormwater control and secondary oil spill containment system, captured and contained oil from electric equipment in the case of leaks or failures. The stormwater control and secondary spill containment system at the Station L is discussed in more detail in the response to Question 13i. Site drainage was also evaluated in the 1984 Station L Master Plan and the 1994 Phase III Revised Final Site Investigation Report for Station L; see the documents (Q15_1984-01-27 SERA_Phase I.pdf and Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15.	Question 19 Attachments Q19_1975 SPCC.pdf Q19_1980 SPCC.pdf Also see Question 15 Attachments Q15_1984-01-27 SERA_Phase I.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf
Section 4.0 - Respondent's Operational Activities		
20. Describe the nature of your operation or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased.	For a description of the various PGE operations and activities at Station L, see the response to Question 5g. The primary purpose of Station L was to generate electrical power, provide continuous electrical power to customers, and to protect the public and equipment from electrical and mechanical faults. PGE generated electricity at the Station F power plant from approximately 1901 to 1911, and at the Station L power plant from 1910/1911 to 1965. To the best of PGE's knowledge, after reasonable inquiry, PGE manned the Lincoln Substation from approximately 1910/1911 to 1965. PGE had other operations at Station L (e.g., storage, communications center, motor pool garage, etc.) through 1986/2005. The years that PGE conducted activities on Parcels A through I spanned from approximately 1901 to 1986/2005, but varied by parcel; see the response to Question 5f for the years that PGE operated on each of the Station L parcels. PGE conducted remedial activities on Station L from 1986 to 1998. See the response for Question 13k for a discussion of modifications at Station L over time.	
21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:	Waste and materials have been handled at Station L in conjunction with various operations, construction projects, and spills. For details on the material storage areas, surplus (used) and obsolete equipment storage areas, and waste storage/handling/treatment areas at Station L, see the responses to Questions 13g and 16. To the best of PGE's knowledge, after reasonable inquiry, the responses to Questions 21a through 21d summarize the nature, characteristics, quantity, and handling, if known, of waste and materials at Station L. Employee interviews detailed in the document (Q21c_1987-05-27_Memo_Poss Burial of Capacitors.pdf) attached in response to Question 21c, suggest that carcasses of old capacitors	

EPA Question	Response	Records/Information Available
	may have been buried at Station L. PGE believes that these employees' recollections were mistaken. PGE does not have any corroborating documentation concerning burial of equipment on this property and PGE's historical practice with old transformers, capacitors, and other scrap metal materials was to recycle and/or sell the equipment.	
a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;	<u>Station F Power Plant</u> The Station F power plant operated from 1901 until 1911 (prior to the investigation period, 1937 to present). Please note, operations at Station F power plant ceased prior to the generalized marketing of polychlorinated biphenyls (PCBs) in the United States beginning in 1929. Power was generated by burning wood waste (solid). The wood waste was stored on site; see the response to Question 16 for further details. The primary materials that may have been used for equipment maintenance include solvents (liquid), denatured alcohol (liquid), degreasers (liquid), lubricating grease (semi-liquid), hydraulic fluid (liquid), and paint (liquid). To the best of PGE's knowledge, after reasonable inquiry, PGE does not know the quantity of, nature of, date(s) of disposal, or location where waste was disposed or recycled during the Station F power plant operations. <u>Station L Power Plant and Ancillary Facilities/Operations</u> PGE operated the Station L Power Plant from approximately 1911 to 1975 (placed in "cold" standby in 1965 and formally retired in 1975), as well as several ancillary facilities associated with the power plant (e.g., Lincoln Substation and tank farm). From 1911 to 1956, the Station L power plant was fueled by sawdust or wood chips (solid) and oil fuel (liquid). From 1957 to 1964, the power plant was fueled exclusively by oil fuel (liquid) and natural gas (gaseous). The sawdust and oil fuel were stored on site; see the response to Question 16 for further details. The primary materials that may have been used for equipment maintenance include transformer oil (liquid), solvents (liquid), denatured alcohol (liquid), degreasers (liquid), lubricating grease (semi-liquid), hydraulic fluid (liquid), and paint (liquid). To the best of PGE's knowledge, after reasonable inquiry, PGE does not know the quantity of, nature of, date(s) of disposal, or location where waste was disposed or recycled during the Station L power plant operations. After the power plant was retired in 1975, PGE commenced decommissioning the plant by removing and selling the power plant equipment. In 1976, PGE hired American Equipment & Supply Company to remove the turbine generators (generators 1 and 2), including associated equipment; see the document (Q21c_1976 Station L Contractor.pdf) attached in response to Question 21c. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know to whom these and the other Station L power plant equipment were sold. <u>Other PGE Facilities</u> Other PGE operations associated with Station L included a fleet garage, garage fueling station, electricians building, machine shop, welding shop, communication center, radio shop, sandblast shed, EM&C storage building, analytical lab, public relations storage building, helicopter pad and fueling system, tank farm, scrap steel pile, chemical/paint storage shed, lead-covered cable storage area, utility power pole storage areas, transformer storage areas, equipment storage areas, and other various smaller storage structures. These other operations began at various	Question 21 Attachments Q21a_1986-09-23 OMNI Drum Strg Sampling Rpt.pdf Q21a_1986-11-07 Eq list & PCB results.pdf Q21a_1991-05-24_PGE_1971 Spill Transformer.pdf Q21c_1976 Station L Contractor.pdf Q21c_1979-04-03 Invoice.pdf Q21c_1984-03-07 PCB Disposal.pdf Q21c_1986-04-22 PCB trans report.pdf Q21c_1986-07-29 PCB trans report.pdf Q21c_1986-10-16 PCB trans report.pdf Q21c_1986-11-06 Spill Disposal.pdf Q21c_1986-11-07 Eq list & PCB results.pdf Q21c_1986-1987 TSCA HW Manifests.pdf Q21c_1987-03-12 Bill of Lading.pdf Q21c_1987-03-30 PCB trans report.pdf Q21c_1987-05-27_Memo_Poss Burial of Capacitors.pdf Q21c_1987-08-19 Bill of Lading.pdf Q21c_1987 CWM_HazMat Disposal Invoices.pdf Q21c_1987-1988 RCRA HW Manifests.pdf Q21c_1988-01-11 PGE-HMS Contract.pdf Q21c_1988-01-13 PCB Trans report.pdf Q21c_1988-01-14_Disposal of Barrels in Station L.pdf Q21c_1988-08-01 PCB trans report.pdf Q21c_1988-10-14 PCB trans report.pdf Q21c_1989-01-18 Asbestos Removal Contract.pdf Q21c_1989-01-25_OMSI-PGE Asbestos Agrmnt.pdf Q21c_1989-03-23 PAS Memo.pdf Q21c_1989-04-04 PAS Memo.pdf Q21c_1989-06-13 HMS Memo.pdf Q21c_1989-07-20 UST Content Disposal Req.pdf Q21c_1989-08-21 PCB trans report.pdf Q21c_1989-10-02 HMS Memo.pdf Q21c_1989-10-04 Water Disposal Work Plan.pdf Q21c_1989-10 St. Johns Landfill Receipts.pdf Q21c_1989 St. Johns Landfill Receipts.pdf Q21c_1989 RCRA HW Manifests.pdf Q21c_1989 TSCA HW Manifests.pdf Q21c_1989 HW Generation Report.pdf Q21c_1989 HW Shipment Record.pdf Q21c_1990-01-19 PCB Trans Record.pdf

EPA Question	Response	Records/Information Available
	times on different parcels but ceased by 1986 on Parcels A through H and by 2005 on Parcel I. The primary materials/wastes that were or may have been used, stored, or otherwise handled during PGE's other operations at Station L include transformer oil (liquid), solvents (liquid), denatured alcohol (liquid), degreasers (liquid), lubricating grease (semi-liquid), hydraulic fluid (liquid), paint (liquid), antifreeze (liquid), transmission oil (liquid), fuel oil (liquid), electrical wiring (solid), scrap metals (solid), sandblast grit (solid), analytical chemicals (liquid and solid), lead-covered cables (solid), utility power poles (solid), surplus and obsolete oil-filled transformers (solid, liquid-filled), and dry surplus equipment (solid). The products/materials currently used at PGE properties within Oregon are listed in the attached document (Q33_08 EMC List.pdf). Material Safety Data Sheets (MSDS) for these products/materials are provided in a supplemental submittal (Supplemental Submittal S2). Products/materials used in the past are similar to those used currently. To the best of PGE's knowledge, after reasonable inquiry, PGE has no further knowledge of the quantity of or nature of stored materials, other than the information provided in responses to Questions 13 and 16. To the best of PGE's knowledge, after reasonable inquiry, PGE has limited knowledge of, nature of, date(s) of disposal, or location where waste was disposed or recycled during the other Station L operations. The following summarizes the known information on waste handling: • In 1979, a capacitor (solid) from Station L (may have actually been Stephens Substation) and multiple capacitors (solid) from several PGE locations outside of the Investigation Area (e.g., Sellwood, Progress, and Urban Substations) were stored at the EM&C storage yard within Station L prior to disposal at Arlington Landfill; see the document (Q21c_1979-04-03 Invoice.pdf) attached in response to Question 21c. • In 1984, to the best of PGE's knowledge, after reasonable inquiry, approximately 6,000 gallons of PCB-containing oil (liquid), drained from electrical equipment and/or USTs and stored in a mobile storage skid in the east side yard at Station L, were disposed at the Union Electric Co; see the document (Q21c_1984-03-07 PCB Disposal.pdf) attached in response to Question 21c. • PGE had oil-filled equipment (solid, liquid-filled) on various portions of the Station L property including Station L Power Plant equipment (early 1900s to 1975), Lincoln Substation equipment (early 1900s to 1975/1986), and stored electrical equipment (sometime prior to 1966 to 1986/2005). The attached document (Q21a_1986-11-07 Eq list & PCB results.pdf) lists the oil-filled substation equipment at Station L (likely Lincoln Substation) in 1986. The transformer capacity records provided in a supplemental submittal (Supplemental Submittal S8) list the power generating equipment at Station L from 1936 to 1978, some of which may have been located in Stephens Substation since it was originally considered part of Station L. Other oil-filled equipment transportation, disposal, or cleaning documents include: o In 1986, PGE cleaned the oil residue (liquid) on the evaporation tray of a	Q21c_1990-08-17 Disposal of PCBs.pdf Q21c_1990-08-24 PGE-Chapman to CWM-Santos.pdf Q21c_1990-08-28 Waste Disposal App.pdf Q21c_1990-08-29 Waste Disposal Auth & App.pdf Q21c_1991-02 Hillsboro Dump Tickets.pdf Q21c_1991-07-22 Invoice.pdf Q21c_1991-08-15 Waste Disposal App.pdf Q21c_1991-08-20 Hillsboro Dump Tickets.pdf Q21c_1992-10-6 Soil Incineration.pdf Q21c_1993-12-13 RCRA Waste Profile.pdf Q21c_1993-12-13 Non-Reg Waste Profile.pdf Q21c_1994-03-30 Drummed Soil and Water.pdf Q21c_1994-03-30 NonHW Drums.pdf Q21c_1994-06-06 PCB_control sheet.pdf Q21c_1994-06-13 Waste Profile-PCB.pdf Q21c_1994-07-08 Disposal of Investigation Wst Water.pdf Q21c_1994-07-15 Soils Disposal Non-HW Manifest.pdf Q21c_1994 Soil Certificates.pdf Q21c_1994 CWM_HazMat Disposal Invoices.pdf Q21c_1994 Non-Reg HW Manifests.pdf Q21c_1994 RCRA HW Manifests.pdf Q21c_1994 TSCA HW Manifests.pdf Q21c_1995-08-29 ACM Waste Shipment.pdf Q21c_1998-02-19 Soils Disposal Non-HW Manifest.pdf Q21c_1998-03-02 Soils Disposal Non-Haz Manifest.pdf Q21c_2001-05-01 Soil disposal.pdf Q21c_2006-01-10_OMSI yard tanks.pdf Also see Question 13 Attachments Q13b_1986 Lower Sta L Figure.pdf Q13b_1956-11-19 COP DPW Waterline.pdf Also see Question 15 Attachments Q15_1987-12-31 HC Removal of PCB Soils & DR.pdf Q15_1988-02-29 HC RAP Vol I.pdf Q15_1988-02-29 HC RAP Vol II.pdf Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf Q15_1989-1991 SEUA Soil Sampling Docs.pdf Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf Q15_1994-08-09 EPA Site Investigation Report.pdf Also see Question 33 Attachment

EPA Question	Response	Records/Information Available
	transformer, disposing of the cleaning rags/pads at the Arlington Landfill; see the document (Q21c_1986-07-29 PCB trans report.pdf) attached in response to Question 21c. o In 1986, two non-leaking capacitors (solid, liquid-filled) that had been stored in the apprentice training yard at Station L were disposed of at ENSCO, after interim storage at PSC; see the document (Q21c_1986-10-16 PCB trans report.pdf) attached in response to Question 21c. o In 1987, a non-leaking capacitor (solid, liquid-filled) that had been stored at the EM&C yard at Station L was transported to PSC and placed in stock or reinstalled elsewhere; see the document (Q21c_1987-03-30 PCB trans report.pdf) attached in response to Question 21c. <u>Sanitary Waste</u> During PGE's ownership of Station L, sanitary waste (liquid, semi-solid) was handled on site by septic tanks/cesspools. The document (Q13b_1986 Lower Sta L Figure.pdf) attached in response to Question 13b shows the location of a septic tank/cesspool in the southern portion of Parcel C in 1986, and the document (Q13b_1956-11-19 COP DPW Waterline.pdf) attached in response to Question 13b shows the location of the restrooms in the northern portion of Parcel C in 1956, which likely discharged to a septic tank/cesspool. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know where, when, or how the septic tanks/cesspools were emptied or maintained at Station L. <u>Station L Remediation</u> After retirement of the Station L power plant in 1975, PGE evaluated several alternatives for the future development of Station L, including donation of the property. PGE decided to donate the northern 18 acres of Station L (Parcels A through F) to OMSI. Title for this portion of Station L passed from PGE to OMSI on 31 December 1986. Because PGE had stored electrical equipment containing PCBs in some areas of Station L, PGE retained the responsibility for cleaning up PCB contamination and for the removal of all ACM on the donated land as a contingency of the donation. To fulfill this voluntary obligation, PGE embarked on an uplands investigation and cleanup program at Station L. This initial investigation resulted in the identification of several areas of PCB contamination (≥50 ppm) in 1986. • Between October and November 1986, PGE removed surface soil at locations with elevated PCB concentrations (≥50 ppm) in the trench area and near the turbine building, resulting in the disposal of approximately 430 tons of PCB-containing soil, rock, and solid waste cleanup material (solid) at the Arlington Landfill; see the document (Q21c_1986-1987 TSCA HW Manifests.pdf) attached in response to Question 21c. • In 1986/1987, ACM was removed from the old transformer storage yard. The approximately 8 to 9 cubic yards of ACM (solid) was disposed of at the Circle C Landfill in 1987; see the documents (Q21c_1987-03-12 Bill of Lading.pdf and Q21c_1987-08-19 Bill of Lading.pdf) attached in response to Question 21c.	Q33_EMC List.pdf Also see Question 40 Attachment Q40_Waste-Materials Receivers and Carriers.pdf Also see Question 50 Attachments Q50_1988-08-03 DEQ Order of Consent.pdf Q50_1989-10-25 COP to PGE_Asbestos.pdf Q50_1991-04-17 Cert of Completion for Phase I & II.pdf Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf Q50_1993-11-16 DEQ Order of Completion.pdf Q50_1994-09-26 Phase III ROD.pdf Q50_1989-03-06_PGE to BES_UST Discharge.pdf Q50_1989-05-22_PGE to BES_UST Discharge.pdf Also see Question 51 Attachments Q51_1986-04-18&30 Spill Correspondances.pdf Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf Q51_1986-10-14 EPA Inspection PCB Violations.pdf Q51_1986-11-14 EPA - TSCA Violation.pdf Q51_1986-11-19 Sta L Memo_Spill.pdf Q51_1986-12-03 Sta L Spill Procedures.pdf Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf Also see Question 52 Attachments Q52_1989-06-14 Special Permit Request.pdf Q52_1989-06-30 Wastewater Discharge Permit.pdf Q52_1989-09-18_PGE Memo on UST Decom.pdf Q52_1989-09-22 Permit Modification.pdf Q52_1989-09-25 Permit Modification.pdf Q52_1989-10-05 Asbestos Permit Modification.pdf Q52_1990-05-10 Modification Request.pdf Q52_1990-03-20 OMSI Permit Request.pdf Also see all Question 53 Attachments Also see all Question 62 Attachments

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	Further soil testing in early 1987 identified additional areas of PCB contamination (≥50 ppm), including along the shoreline adjacent to the turbine room. Although river sediment contamination was not suspected at Station L prior to the initial uplands site investigation, it became apparent that PCB-contaminated materials may have migrated into the river, west of the turbine building. In addition to further uplands investigations, PGE sampled and analyzed the river water and sediment, which resulted in PCB detections in the sediment. PGE collected additional sediment samples to determine the extent of contamination and found that an approximately 80- by 120-foot area contained PCB concentrations ranging from <1 to 286 ppm. Based on the nature and extent of PCB-contamination in the sediment, it appeared that the PCBs came from a single source at the edge of the river next to the turbine building. A review of historical PGE records showed that a transformer on the west side of the turbine building had failed in April 1971 and released askarel oil (>500 ppm PCBs); see the response and documents (Q62_1987-06-15 Memo on Historical PCB.pdf, Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf, and Q62_1987-06-24_PGE Phone Memo_1971 spill.pdf) attached for Question 62. To the best of PGE's knowledge, after reasonable inquiry, this transformer was abandoned in place in 1971 and removed from Station L in 1987; however, PGE has no knowledge of where it was transported or disposed; see the attached document (Q21a_1991-05-24_PGE_1971 Spill Transformer.pdf). In June 1987, PGE entered Oregon DEQ's Voluntary Cleanup Program. PGE began soil, sediment, surface water, and groundwater investigations under the cleanup program. In March 1988, PGE submitted a RAP to the Oregon DEQ for remediation of PCB-contaminated sediments next to the turbine building; see the documents (Q15_1988-02-29 HC RAP Vol I.pdf and Q15_1988-02-29 HC RAP Vol II.pdf) attached in response to Question 15. The Oregon DEQ requested that PGE enter into a consent order covering the entire Station L facility before PGE began its proposed remedial action. • Between June and November 1987, a total of 2,486.9 tons of PCB-containing soil were removed from X Area, Y Area, Stephens Substation (eastern border), the Underground Tank Area, the service road, Conveyor Drive Areas, the Sumps, the Poulsen Building, and the Turbine Area; see the document (Q15_1987-12-31 HC Removal of PCB Soils & DR.pdf) attached in response to Question 15. The PCB-containing soil (solid) was disposed at Arlington Landfill; see the documents (Q21c_1986-1987 TSCA HW Manifests.pdf, Q21c_1987 CWM_HazMat Disposal Invoices.pdf, and Q21c_1988-01-13 PCB Trans report.pdf) attached in response to Question 21c. • Between April 1987 and May 1988, PGE removed and disposed of (recycled) liquid RCRA waste/materials and liquid non-regulated waste/materials from Station L. To the best of PGE's knowledge, after reasonable inquiry, these materials were from the wastes/materials at the Central Division Garage, prior to its relocation outside of the Investigation Area. Under the Station L USEPA Hazardous Waste Generator (HWG) ID number (ORD981764376), PGE disposed of approximately 18,585 pounds (lbs) of	

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	waste petroleum hydrocarbons (liquid ignitable waste) and 585 lbs of halogenated solvents (liquid) at Safety Kleen; 900 gallons of waste oil with halogenated solvents and 55 gallons of petroleum solvents at Sol-Pro/Lilyblad Inc; and 450 gallons of a mixture of oil with halogenated solvents and 110 gallons of oil with non-halogenated solvents at McClary Columbia. See the document (Q21c_1987-1988 RCRA HW Manifests.pdf) attached in response to Question 21c. In August 1988, PGE entered into a three-phase consent order (DEQ No. ECSR-NWR-88-02) to identify the nature and extent of hazardous substances over the entire Station L property (Parcels A through I) and Stephens Substation (addressed in a separate 104(e) response); see the document (Q50_1988-08-03 DEQ Order of Consent.pdf) attached in response to Question 50. Phase I investigated/remediated the PCB contamination of the Willamette River shoreline (above the ordinary low water line) adjacent to the turbine building, Phase II investigated/remediated the PCB contamination of the Willamette River underwater sediments (below the ordinary low water line), and Phase III investigated/remediated hazardous substances contamination (if any) of groundwater, surface water, structures, soils, and other Station L sediments. The following summarizes the waste and materials removed during the Station L remedial activities under the under the OMSI donation contingency and the Oregon DEQ consent order: • In 1989, PGE pumped, treated, and discharged the water contents (liquid) from two of the Station L USTs (likely EY-03 and EY-04) into the municipal sanitary sewer. To the best of PGE's knowledge, after reasonable inquiry, PGE also discharged the contents of the 226 waste drums (liquid-filled) that had been stored in the HP boiler room basement. See the documents (Q50_1989-03-06_PGE to BES_UST Discharge.pdf and Q50_1989-05-22_PGE to BES_UST Discharge.pdf) attached in response to Question 50, the documents (Q21a_1986-09-23 OMNI Drum Strg Sampling Rpt.pdf and Q21_1988-01-14_Disposal of Barrels in Station L.pdf) attached in response to Question 21c, and the document (Q52_1989-09-18_PGE Memo on UST Decom.pdf) attached in response to Question 52. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know the total quantity of water discharged into the sewer. • In 1988, PGE completed the Phase I consent order requirements by remediating the shoreline adjacent to the turbine building to an average concentration of 1 ppm PCBs; see the document (Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf) attached in response to Question 15. A total of approximately 80 tons of soil/sediment (solid) were excavated. A total of approximately 174.3 tons of soil/sediment, debris, and concrete were removed and disposed of at the Envirosafe Services of Idaho Inc landfill; see Appendix B in the document (Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf) attached in response to Question 15. • In 1989, PGE removed the remaining ACM from Station L. Approximately 285 tons of	

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	ACM (solid) was removed and disposed of at the St Johns Landfill; see the documents (Q21c_1989 St. Johns Landfill Receipts.pdf) attached in response to Question 21c. A total of approximately 62,750 gallons of treated (filtered) ACM-contaminated waste water (liquid), generated from the washing of equipment and building interiors and daily decontamination showers for personnel, was discharged to the municipal sewer lines under a City of Portland special discharge permit. During the discharges, asbestos-containing water was inadvertently discharged to the sewer due to an apparent failure in the filtration system. See the document (Q50_1989-10-25 COP to PGE_Asbestos.pdf) attached in response to Question 50 and the attached associated documents (Q21c_1988-01-11 PGE-HMS Contract.pdf, Q21c_1989-01-18 Asbestos Removal Contract.pdf, Q21c_1989-01-25_OMSI-PGE Asbestos Agrmnt.pdf, Q21c_1989-03-23 PAS Memo.pdf, Q21c_1989-04-04 PAS Memo.pdf, Q21c_1989-06-13 HMS Memo.pdf, Q21c_1989-10-02 HMS Memo.pdf, and Q21c_1989-10-04 Water Disposal Work Plan.pdf). For further details, see the responses to Questions 13g and 51. • In March 1990, OMSI was granted permission to discharge water (stormwater) into the Willamette River from two open USTs, which had been emptied and cleaned by PGE prior to OMSI taking possession. Prior to the discharge of the water from these two OMSI USTs and due to OMSI demolition activities, water from these tanks entered into a third UST that PGE was in the process of cleaning. Because the water was sourced from the two OMSI USTs, PGE sent a letter to the Oregon DEQ, Water Quality Section in May 1990 requesting permission to discharge the water (liquid) from PGE's UST to the Willamette River under the OMSI Special Permit. See the documents (Q52_1990-05-10 Modification Request.pdf and Q52_1990-03-20 OMSI Permit Request.pdf) attached in response to Question 52. To the best of PGE's knowledge, after reasonable inquiry, PGE's request was granted. • In 1990, PGE completed the Phase II consent order requirements by remediating the impacted river sediment adjacent to the turbine building to an average concentration of 1 ppm; see the document (Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf) attached in response to Question 15. The following summarizes the treatment or disposal of media and waste: o A total of approximately 535,700 gallons of water (liquid) were treated (filtered) with the sediment dewatering and water treatment facility and then discharged back into the river under a temporary (two-month) NPDES permit; see Appendices B, G, and J in the document (Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf) attached in response to Question 15. For further detail, see the response to Question 13g. o A total of 17 tons of sediment and miscellaneous debris (solid) were removed from the river. The 17 tons of sediment/debris and 23.5 tons of carbon (from the sediment dewatering and water treatment) and mixed media were disposed of at the Arlington Landfill; see Appendix K in the document (Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf) attached in response to Question 15. Also	

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	see the attached associated documents (Q21c_1990-08-17 Disposal of PCBs.pdf and Q21c_1990-08-24 PGE-Chapman to CWM-Santos.pdf). • In April 1991, the Oregon DEQ issued a certificate of completion indicating that PGE had met the Phase I and Phase II consent order requirements; see the document (Q50_1991-04-17 Cert of Completion for Phase I & II.pdf) attached in response to Question 50. • In 1994, PGE completed the Phase III consent order requirements by remediating the soil to approximately 1 ppm PCBs and remediating the majority of soil for other chemicals to levels below background and/or less than regulatory screening levels; see the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. • Of the more than 10,000 tons of PCB-containing soil/materials (solid), more than 3,000 tons of soils/materials (solid) containing non-PCB contaminants (e.g., petroleum hydrocarbons and metals), and other waste/materials (liquid and solid) (e.g., RCRA waste) removed from Station L, the following highlights the treatment and/or disposal of soil and other special waste generated during the Phase III remediation (1988-1998): o In 1989, under the Station L USEPA HWG ID number (ORD 981764376), PGE removed liquid RCRA waste (ignitable waste, halogenated solvents, non-halogenated solvents, and/or lead and cadmium waste) with non-regulated cleaning solution (phosphates, soap, and water) from Station L, of which 2,374 gallons was disposed of at Sol-Pro Inc, 580 lbs were disposed of at Environmental Pacific Corp, and 719 lbs were recycled at Safety Kleen; see the document (Q21c_1989 RCRA HW Manifests.pdf) attached in response to Question 21c. o In 1989, PGE disposed of approximately 645 tons of asphalt (solid) with low levels of PCBs (<2 ppm) from Station L at the St Johns Landfill under a special waste permit from Metro; see the document (Q21c_1989-10 St. Johns Landfill Receipts.pdf) attached in response to Question 21. Also see Appendix C of the document (Q15_1989-1991 SEUA Soil Sampling Docs.pdf) attached in response to Question 15. o Between 1989 and 1994, approximately 5,700 tons of PCB-containing soil (solid) were disposed of at Arlington Landfill; see the documents (Q21c_1989 TSCA HW Manifests.pdf and Q21c_1994 TSCA HW Manifests.pdf) attached in response to Question 21c o In 1990, approximately 160 cubic yards of metal-containing soil (solid) removed from near the former machine shop were disposed of at St. Johns Landfill under special permit; see the documents (Q21c_1990-08-28 Waste Disposal App.pdf and Q21c_1990-08-29 Waste Disposal Auth & App.pdf) attached in response to Question 21c. o In 1991, approximately 630 cubic yards of petroleum hydrocarbon-containing	

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	soil (solid) were disposed of at Hillsboro Landfill; see the document (Q21c_1991-02 Hillsboro Dump Tickets.pdf, Q21c_1991-08-15 Waste Disposal App.pdf, and Q21c_1991-08-20 Hillsboro Dump Tickets.pdf) attached in response to Question 21c. o In 1990/1991, approximately 2,650 cubic yards of petroleum-hydrocarbon soil (solid) from around the USTs in Parcel A were excavated and moved to the portion of Station L owned by PGE at that time (Parcel H and/or Parcel I). The soil was treated through spreading and aeration from June 1990 to March 1991. By February 1991, the total petroleum hydrocarbon concentration in the soil ranged from 24 to 46 ppm (below the 80 mg/kg cleanup level for TPH). For further details, see the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. o In 1994, under the Station L USEPA HWG ID number (ORD987185204), approximately 250 gallons of non-regulated tank rinsate water (liquid) and 285 lbs of non-regulated empty drums (solid) were disposed of at the Arlington Landfill; see the documents (Q21c_1994 Non-Reg HW Manifests.pdf and Q21c_1993-12-13 Non-Reg Waste Profile.pdf) attached in response to Question 21c. o In 1994, an air sparging remediation system was installed to reduce the BTEX concentrations in the groundwater under Parcel A. During the installation of this system, investigation derived waste was generated: soil drill cuttings with petroleum hydrocarbons (solid), monitoring well purge water with BTEX (liquid), and decontamination water (liquid). Approximately 2,133 tons of petroleum hydrocarbon-containing soil was thermally treated at Oregon Hydrocarbons/TPS Technologies; see the document (Q21c_1994 Soil Certificates.pdf and Q21c_1994-07-15 Soils Disposal Non-HW Manifest.pdf) attached in response to Question 21c. Under the Station L USEPA HWG ID number (ORD987185204), approximately 1,525 gallons of RCRA monitoring well purge water (ignitable waste) and non-regulated decontamination water were disposed of at Chemical Waste Management in Colorado; see the documents (Q21c_1994 RCRA HW Manifests.pdf and Q21c_1993-12-13 RCRA Waste Profile.pdf) attached in response to Question 21c. Also see the associated memos (Q21c_1994-03-30 Drummed Soil and Water.pdf and Q21c_1994-07-08 Disposal of Investigation Wst Water.pdf) attached in response to Question 21c. o In May 2001, 5 drums of soil cuttings from previous site investigations were disposed of at the Hillsboro Landfill; see the attached document (Q21c_2001-05-01 Soil disposal.pdf). To the best of PGE's knowledge, after reasonable inquiry, these soil cuttings were from the the site investigation/remediation at Station L. Soil (solid) and other materials/wastes (solid and liquid) were either transferred directly to the appropriate disposal facility or to one of PGE's waste and used materials handling facilities for interim storage prior to disposal. PGE's waste and used matersils handling facilities were Harborton Substation (located at 12500 NW Marina Way, Portland, OR), Sellwood Substation (located at 8856 SE 13th Avenue,	

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	Portland, Oregon), Portland Service Center (PSC) (located at 3700 SE 17th Avenue, Portland, Oregon), or Wilsonville (located at 9480 SW Boeckman Rd, Wilsonville, Oregon - only soil/gravel with <50 ppm PCBs). Additional waste documentation from the Phase III remedial activities is provided by the documents (Q21c_1988-08-01 PCB trans report.pdf, Q21c_1988-10-14 PCB trans report.pdf, Q21c_1989-07-20 UST Content Disposal Req.pdf, Q21c_1989-08-21 PCB trans report.pdf, Q21c_1989 HW Generation Report.pdf, Q21c_1989 HW Shipment Record.pdf, Q21c_1990-01-19 PCB Trans Record.pdf, Q21c_1990-08-29 Waste Disposal Auth & App.pdf, Q21c_1991-07-22 Invoice.pdf, Q21c_1992-10-6 Soil Incineration.pdf, Q21c_1994-03-30 NonHW Drums.pdf, Q21c_1994-06-06 PCB_control sheet.pdf, Q21c_1994-06-13 Waste Profile-PCB.pdf, and Q21c_1994 CWM_HazMat Disposal Invoices.pdf) attached in response to Question 21c. • In June 1991, PGE received a "NFA" determination for the USTs at Station L; see the document (Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf) attached in response to Question 50. In November 1993, the Oregon DEQ issued an Order of Completion for Station L Phase III; see the document (Q50_1993-11-16 DEQ Order of Completion.pdf) attached in response to Question 50. In September 1994, PGE received a final "NFA" for Station L in Oregon DEQ's Station L Phase III ROD; see the document (Q50_1994-09-26 Phase III ROD.pdf) attached in response to Question 50. The USEPA completed a Site Investigation of Station L in August 1994; see the document (Q15_1994-08-09 EPA Site Investigation Report.pdf) attached in response to Question 15. Based on their site investigation and other pertinent information, the USEPA found it appropriate to refer to state authority for Station L and did not anticipate further investigation for Station L under the Federal Superfund Program. • Due to the decline of BTEX concentrations in groundwater and because the air sparging remediation system had reached its threshold of effectiveness, the air sparging remediation system, including the monitoring wells (W-8 through W-11) and process wells (AS-1 through AS-7), was abandoned in January 1998. In March 1998, 4.5 tons of soil cuttings with petroleum hydrocarbons (solid) generated during the air sparging remediation system abandonment were disposed of at Oregon Hydrocarbons/TPS Technologies; see the documents (Q21c_1998-02-19 Soils Disposal Non-HW Manifest.pdf and Q21c_1998-03-02 Soils Disposal Non-Haz Manifest.pdf) attached in response to Question 21c. Soil, gravel, and absorbents (solid) were also removed from Station L in response to spills/releases. To the best of PGE's knowledge, after reasonable inquiry, the following presents all known and available information with respect to specific releases that occurred at Station L (other than the 1971 transformer spill and the remedial activities already discussed, above): • 10 April 1980 and 9 June 1980 – Two non-PGE sourced discharges (liquid) occurred from the storm drain that runs through Station L into the Willamette River; see the	

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	document (Q62_1980_Non-PGE Sourced Spills.pdf) attached in response to Question 62. PGE reported these non-PGE discharges to the Oregon DEQ. • 18 April 1986 – Approximately 5-25 gallons of PCB-containing oil (91-107 ppm) (liquid) spilled from an oil tank onto gravel in the Station L tank farm; see the document (Q62_1986-04-18 Spill Report.pdf) attached in response to Question 62. The spill occurred during the transfer of insulating oil into a holding tank. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD 86-203), contained, and cleaned up (including the removal and disposal of the PCB-containing gravel and soil. The PCB and petroleum hydrocarbon-containing soil/gravel (solid) was disposed of at the Arlington Landfill after interim storage at PSC, a PGE waste and used materials handling facility; see the document (Q21c_1986-04-22 PCB trans report.pdf) attached in response to Question 21c. Also see the response and documents (Q51_1986-04-18&30 Spill Correspondances.pdf, Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf, Q51_1986-10-14 EPA Inspection PCB Violations.pdf, Q51_1986-11-14 EPA - TSCA Violation.pdf, Q51_1986-11-19 Sta L Memo_Spill.pdf, Q51_1986-12-03 Sta L Spill Procedures.pdf, Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf, Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf, Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf, and Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf) attached for Question 51. • 30 April 1986 – Approximately 1 gallon of PCB-containing oil (66 ppm) (liquid) from an oil tank spilled onto gravel in the Station L tank farm; see the document (Q62_1986-04-30 Spill Report.pdf) attached in response to Question 62. The spill occurred during the PCB-containing oil decontamination activities by Sun Ohio Corporation. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD 86-178), contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the PCB and petroleum hydrocarbon-containing soil/gravel (solid) was likely disposed of at Arlington Landfill after interim storage at a PGE waste and used materials handling facility. Also see the response and documents (Q51_1986-04-18&30 Spill Correspondances.pdf, Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf, Q51_1986-10-14 EPA Inspection PCB Violations.pdf, Q51_1986-11-14 EPA - TSCA Violation.pdf, Q51_1986-11-19 Sta L Memo_Spill.pdf, Q51_1986-12-03 Sta L Spill Procedures.pdf, Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf, Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf, Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf, and Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf) attached for Question 51. • 18 September 1986 – Approximately 60 gallons of PCB-containing oil (0.4 ppm) (liquid) were released into the gravel and soil at PGE's Market Street Garage when a UST underground oil pipe ruptured; see the document (Q62_1986-09-18_1701 SE Water.pdf) attached in response to Question 62. The released oil drained into two dry wells in the garage parking lot. The spill was reported to the PGE System Control	

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	Center and the Oregon DEQ (EMD 86-483), contained, and cleaned up (including the PCB-containing absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB and petroleum hydrocarbon-containing absorbent (solid) was likely disposed of at the Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 6 November 1986 – Approximately 2 gallons of PCB-containing oil (approximately 300 ppm) (liquid) from Oil Storage Tank #6 were spilled onto the gravel in the Station L tank farm; see the document (Q62_1986-11-06 Oil Spill Report.pdf) attached in response to Question 62. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). The PCB and petroleum hydrocarbon-containing soil/gravel (solid) was disposed of at the Arlington Landfill after interim storage at Sellwood Substation, a PGE waste and used materials handling facility; see the document (Q21c_1986-11-06 Spill Disposal.pdf) attached in response to Question 21. • 28 January 1987 – Approximately 10-15 gallons of PCB-containing oil (77 ppm) (liquid) were released onto gravel and migrated to surface water within the Station L tank farm; see the document (Q62_1987-01-28 Oil Spill Questionaire.pdf) attached in response to Question 62. The spill occurred when a tanker truck leaked while transferring oil to containers within the tank farm. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel, soil, and absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB- and petroleum hydrocarbon-containing soil/gravel/absorbent (solid) was likely disposed of at Arlington Landfill after interim storage at a PGE waste and used materials handling facility. Confirmation sampling was conducted to ensure cleanup; the confirmation composite soil sample had a PCB concentration of 0.32 ppm. • 16 March 1987 – Approximately 5 gallons of PCB-containing oil (20 ppm) (liquid) spilled onto gravel in the Station L tank farm; see the document (Q62_1987-03-16 Oil Spill Questionaire.pdf) attached in response to Question 62. The spill occurred when oil shifted in a tanker and spilled out of the top lid during filling activities. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the petroleum hydrocarbon-containing soil/gravel (solid) was likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. Confirmation soil sampling results were all less than 1 ppm PCB. • 23 April 1987 – Approximately 45 gallons of PCB-containing oil (1 ppm) (liquid) were released from a pole-mounted transformer onto the gravel in the Station L storage yard when a truck struck the pole. To the best of PGE's knowledge, after reasonable inquiry, the petroleum hydrocarbon-containing soil/gravel (solid) was likely disposed	

EPA Question	Response	Records/Information Available
	of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 7 June 1988 – Approximately 0.03 gallons of PCB-containing insulating oil (35 ppm) and water (liquid) from an emptied 5 kVA transformer was released onto the asphalt at Station L; see the document (Q62_1988-06-07 Oil Spill Questionaire.pdf) attached in response to Question 62. The spill was caused when thieves tipped over a training transformer (empty with some water inside). The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB- and petroleum hydrocarbon-containing absorbent (solid) was likely disposed of at Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 2 February 1989 – Approximately 2 gallons of oil and water (liquid) were released onto PGE's asphalt parking area when five barrels of oil and water froze and burst; see the document (Q62_1989-02-07 Oil Spill Questionaire.pdf) attached in response to Question 62. The lab results of the oil/water were non-detect for PCBs. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of the absorbent). To the best of PGE's knowledge, after reasonable inquiry, the 14 drums of petroleum hydrocarbon-contaminated absorbent (solid) was likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 13 September 1993 – Approximately 1 gallon of PCB-containing oil (9 ppm) (liquid) from a concrete fuel tank spilled onto gravel; see the document (Q62_1993-09-13 Oil Spill Report.pdf) attached in response to Question 62. The spill occurred while EMCON (a PGE contractor) was sampling the tank, which was believed to have been empty. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the approximately 8 cubic feet of petroleum hydrocarbon-containing soil/gravel (solid) was likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 3 November 1993 – Approximately 50-70 gallons of diesel fuel (liquid) were released from the tank farm pipeline onto gravel within the Station L tank farm; see the document (Q62_1993-11-03 Oil Spill Questionaire.pdf) attached in response to Question 62. The spill occurred while O'Sullivan (a PGE contractor) was disassembling piping from the pump house to the tank farm. The spill was reported to the PGE System Control Center and the Oregon DEQ, contained, and cleaned up (including the removal and disposal of gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the approximately 150 square feet of petroleum hydrocarbon-containing soil/gravel (solid) were likely disposed of at Hillsboro Landfill	

EPA Question	Response	Records/Information Available
	or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. In 1995, PGE removed the wooden dock and dolphins (solid) adjacent to Parcel I, including ACM dock steam piping(solid), prior to selling this parcel to KPTV that same year. Approximately 6.3 cubic yards of ACM (solid) were disposed of at the Hillsboro Landfill; see the document (Q21c_1995-08-29 ACM Waste Shipment.pdf) attached in response to Question 21c. To the best of PGE's knowledge, after reasonable inquiry, the non-ACM dock and dolphin waste (solid) also likely was disposed of at the Hillsboro Landfill. PGE tested the contents of two 500 gallon mobile storage tanks that had been stored on Parcel I; see the attached document (Q21c_2006-01-10_OMSI yard tanks.pdf). To the best of PGE's knowledge, after reasonable inquiry, PGE does not know where the tanks and their contents came from. To the best of PGE's knowledge, after reasonable inquiry, these tanks were tested in order to determine proper disposal. To the best of PGE's knowledge, after reasonable inquiry, the companies/persons with whom PGE has made arrangements for disposal/recycling/destruction of wastes and/or used material for PGE properties in Oregon are listed in the document (Q40_Waste-Materials Receivers and Carriers.pdf) attached in response to Question 40. Also see the responses and documents for Questions 15, 21c, 33, 52, 53, and 62. Also see the separate 104(e) response for Stephens Substation, the separate 104(e) response for Harborton Substation, which was historically a PGE waste and used materials handling facility within the Investigation Area, and the supplemental submittal of documentation from other PGE facilities that may have received waste and used materials from Station L (Supplemental Submittal S7).	
b. the chemical composition, characteristics, physical state (e.g., solid. liquid) of each waste or material so transported, used, purchased, generated, stored. treated, disposed, or otherwise handled;	See the response to Question 21a, which includes the information concerning chemical composition, characteristics, and physical state of each waste or material.	

EPA Question	Response	Records/Information Available
c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and	Station F Power Plant & Station L Power Plant and Ancillary Facilities/Operations The Station F power plant operated on wood waste from 1901 until 1911 (prior to the investigation period, 1937 to present). PGE operated the Station L Power Plant from 1911 to 1956 on wood waste and oil fuel, and from 1957 to 1964 on oil fuel and natural gas. The wood waste and fuel oil were stored on site. The primary materials that may have been used for equipment maintenance include transformer oil, solvents, denatured alcohol, degreasers, lubricating grease, hydraulic fluid and paint; these materials were likely stored on site during the historical power plants' operations. For further information, see the responses to Questions 16 and 21a. Other PGE Facilities The primary materials/wastes that were or may have been used, stored, or otherwise handled at Station L during PGE's other operations (post-1978 to 1986/2005) include transformer oil, solvents, denatured alcohol, degreasers, lubricating grease, hydraulic fluid, paint, antifreeze, transmission oil, fuel oil, electrical wiring, scrap metals, sandblast grit, analytical chemicals, lead-covered cables, utility power poles, surplus and obsolete oil-filled transformers, and dry surplus equipment. For further information, see the responses to Questions 16 and 21a. Sanitary Waste During PGE's ownership of Station L, sanitary waste was handled on site by septic tanks/cesspools. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know where, when, or how the septic tanks/cesspools were emptied or maintained at Station L. Station L Remediation After retirement of the Station L power plant in 1975, PGE evaluated several alternatives for the future development of Station L, including donation of the property. PGE decided to donate the northern 18 acres of Station L (Parcels A through F) to OMSI. Title for this portion of Station L passed from PGE to OMSI on 31 December 1986. Because PGE had stored electrical equipment containing PCBs in some areas of Station L, PGE retained the responsibility for cleaning up PCB contamination and for the removal of all ACM on the donated land as a contingency of the OMSI donation. Due to the identification of PCB contamination in the soil at Station L and sediment adjacent to the turbine building, PGE entered into Oregon DEQ's Voluntary Cleanup Program in June 1987. In August 1988, PGE entered into a three-phase consent order (DEQ No. ECSR-NWR-88-02) to identify the nature and extent of hazardous substances over the entire Station L property (Parcels A through I) and Stephens Substation (addressed in a separate 104(e) response). During the site investigations and remedial actions from 1986 to 1994, PGE disposed of PCB-containing soil, petroleum hydrocarbon-containing soil, metal-containing soil, PCB-containing sediment, ACM, as well as other PCB- and/or petroleum hydrocarbon-containing materials. The following presents the generalized waste handling procedures: • In general, soil, sediment, oils/fluids, rags/absorbents, and other materials containing PCBs (≥50 ppm) were sealed in barrels and transported directly to the appropriate	Question 21 Attachments Q21a_1986-11-07 Eq list & PCB results.pdf Q21a_1991-05-24_PGE_1971 Spill Transformer.pdf Q21c_1976 Station L Contractor.pdf Q21c_1979-04-03 Invoice.pdf Q21c_1984-03-07 PCB Disposal.pdf Q21c_1986-04-22 PCB trans report.pdf Q21c_1986-07-29 PCB trans report.pdf Q21a_1986-09-23 OMNI Drum Strg Sampling Rpt.pdf Q21c_1986-10-16 PCB trans report.pdf Q21c_1986-11-06 Spill Disposal.pdf Q21a_1986-11-07 Eq list & PCB results.pdf Q21c_1986-1987 TSCA HW Manifests.pdf Q21c_1987-03-12 Bill of Lading.pdf Q21c_1987-03-30 PCB trans report.pdf Q21c_1987-05-27_Memo_Poss Burial of Capacitors.pdf Q21c_1987-08-19 Bill of Lading.pdf Q21c_1987 CWM_HazMat Disposal Invoices.pdf Q21c_1987-1988 RCRA HW Manifests.pdf Q21c_1988-01-11 PGE-HMS Contract.pdf Q21c_1988-01-13 PCB Trans report.pdf Q21c_1988-01-14_Disposal of Barrels in Station L.pdf Q21c_1988-08-01 PCB trans report.pdf Q21c_1988-10-14 PCB trans report.pdf Q21c_1989-01-18 Asbestos Removal Contract.pdf Q21c_1989-01-25_OMSI-PGE Asbestos Agrmnt.pdf Q21c_1989-03-23 PAS Memo.pdf Q21c_1989-04-04 PAS Memo.pdf Q21c_1989-06-13 HMS Memo.pdf Q21c_1989-07-20 UST Content Disposal Req.pdf Q21c_1989-08-21 PCB trans report.pdf Q21c_1989-10-02 HMS Memo.pdf Q21c_1989-10-04 Water Disposal Work Plan.pdf Q21c_1989-10 St. Johns Landfill Receipts.pdf Q21c_1989 St. Johns Landfill Receipts.pdf Q21c_1989 RCRA HW Manifests.pdf Q21c_1989 TSCA HW Manifests.pdf Q21c_1989 HW Generation Report.pdf Q21c_1989 HW Shipment Record.pdf Q21c_1990-01-19 PCB Trans Record.pdf Q21c_1990-08-17 Disposal of PCBs.pdf Q21c_1990-08-24 PGE-Chapman to CWM-Santos.pdf Q21c_1990-08-29 Waste Disposal Auth & App.pdf Q21c_1991-02 Hillsboro Dump Tickets.pdf

EPA Question	Response	Records/Information Available
	disposal facility. • In general, soil, oils/fluids, rags/absorbents, solvents, and other materials not contaminated with PCB (<50 ppm) were containerized separately and either transported directly to the appropriate disposal facility or to a PGE waste and used materials handling facility for interim storage prior to disposal/recycling. The Toxic Substances Control Act (TSCA) regulation standard and accepted industry standard is to use the term "non-PCB" to describe oils with <50 ppm PCBs; this term is used throughout this document. • In addition, some waste/material was treated during the remedial activities at Station L; see the response to Question 13g for further information: o In 1989, PGE pumped, treated, and discharged the water contents from two of the Station L USTs (likely EY-03 and EY-04) into the municipal sanitary sewer. o In 1989, PGE treated (filtered) ACM-contaminated waste water prior to discharging the treated water to the municipal sanitary sewer under a City of Portland special discharge permit. o In 1990, excavated sediment was dewatered and the removed water was treated (filtered) prior to discharging the treated water into the Willamette River under a temporary NPDES permit. o In 1990/1991, approximately 2,650 cubic yards of petroleum-hydrocarbon soil from around the USTs in Parcel A were excavated and moved to the portion of Station L owned by PGE at that time (Parcel H and/or Parcel I). The soil was treated through spreading and aeration from June 1990 to March 1991. o From 1994 to 1998, groundwater beneath Parcel A impacted with BTEX was treated using an air sparging remediation system, thereby reducing the BTEX concentrations in the groundwater. For further information, see the attached documents, the responses to Questions 13g and 16, and the responses and documents for Questions 15, 21a, 52, 53, and 62. Also see the separate 104(e) response for Stephens Substation, the separate 104(e) response for Harborton Substation, which was historically a PGE waste and used materials handling facility within the Investigation Area, and the supplemental submittal of documentation from other PGE facilities that may have received waste and used materials from Station L (Supplemental Submittal S7).	Q21c_1991-07-22 Invoice.pdf Q21c_1991-08-15 Waste Disposal App.pdf Q21c_1991-08-20 Hillsboro Dump Tickets.pdf Q21c_1992-10-6 Soil Incineration.pdf Q21c_1993-12-13 RCRA Waste Profile.pdf Q21c_1993-12-13 Non-Reg Waste Profile.pdf Q21c_1994-03-30 Drummed Soil and Water.pdf Q21c_1994-03-30 NonHW Drums.pdf Q21c_1994-06-06 PCB_control sheet.pdf Q21c_1994-06-13 Waste Profile-PCB.pdf Q21c_1994-07-08 Disposal of Investigation Wst Water.pdf Q21c_1994-07-15 Soils Disposal Non-HW Manifest.pdf Q21c_1994 Soil Certificates.pdf Q21c_1994 CWM_HazMat Disposal Invoices.pdf Q21c_1994 Non-Reg HW Manifests.pdf Q21c_1994 RCRA HW Manifests.pdf Q21c_1994 TSCA HW Manifests.pdf Q21c_1995-08-29 ACM Waste Shipment.pdf Q21c_1998-02-19 Soils Disposal Non-HW Manifest.pdf Q21c_1998-03-02 Soils Disposal Non-Haz Manifest.pdf Q21c_2001-05-01 Soil disposal.pdf Q21c_2006-01-10_OMSI yard tanks.pdf Also see all Question 15 Attachments Also see all Question 52 Attachments Also see all Question 53 Attachments Also see all Question 62 Attachments
d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.	See the responses to Questions 16 and 21a, which include the available information on the quantity of each waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by PGE.	

EPA Question	Response	Records/Information Available
22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.	PGE has conducted various operations and activities at Station L, which is adjacent to the Willamette River, including power plant operations, fleet garage, garage fueling station, electricians building, machine shop, welding shop, communication center, radio shop, sandblasting, EM&C storage building, analytical lab, public relations storage building, helicopter pad and fueling system, tank farm, scrap steel pile, chemical/paint storage shed, lead-covered cable storage area, utility power pole storage areas, transformer storage areas, and other equipment storage areas. See the responses to Questions 5g and 16 for further information on the various PGE operations and activities at Station L. PGE operations and activities over and on the Willamette River included construction of docks, pilings, and pump houses at various times; operation of the oil docks to receive and pump fuel oil from barges to the Station L power plant (early 1900s to 1965) and to the AST in the tank farm (approximately 1957 to 1965); the demolition of in-water structures at various times; removal of PCB-containing soil on the shoreline adjacent to the turbine building to an average concentration of 1 ppm PCBs in 1988; removal of PCB-containing sediment adjacent to the turbine building to an average concentration of 1 ppm PCBs in 1990; and the placement of a sediment cap over the remaining sediment adjacent to the turbine building in 1990. To the best of PGE's knowledge, after reasonable inquiry, a principal source of the PCBs in the shoreline and sediment adjacent to turbine building was likely from a transformer formerly stored on the west side of the turbine building, which failed and released askarel oil (>500 ppm PCBs) in April 1971; see the response and documents (Q62_1987-06-15 Memo on Historical PCB.pdf, Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf, and Q62_1987-06-24_PGE Phone Memo_1971 spill.pdf) attached for Question 62. Also see the responses to Questions 15 and 21.	See Question 62 Attachments Q62_1987-06-15 Memo on Historical PCB.pdf Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf Q62_1987-06-24_PGE Phone Memo_1971 spill.pdf
23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.	See response to Question 22 for a description of the PGE operations at the Station L docks. To the best of PGE's knowledge, after reasonable inquiry, there was no ship building, retrofitting, maintenance, or repair activities at the Station L docks during PGE's ownership.	

EPA Question	Response	Records/Information Available
24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste, or materials and whether any such hazardous substances, waste, or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.	Not applicable. To the best of PGE's knowledge, after reasonable inquiry, PGE did/does not have an aquatic lands lease or easement for the submersible land, including the sediment cap, adjacent to Station L.	
25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 to the present). Provide the brand name of all pesticides or herbicides used.	Several herbicides were used at Station L to control vegetation growth. From 1992 through 2005, one or more herbicides (i.e., Oust, Diuron, Princep, Krovar, and/or Garlon4) were used at Parcel H (1992-1995) and Parcel I (1992-2005). To the best of PGE's knowledge, after reasonable inquiry, the following are the quantities applied (when applied): • Oust – 2 oz per acre • Diuron – 5-6 lbs per acre • Princep – 5 lbs per acre • Krovar – 10 lbs per acre • Garlon 4 – as needed for spot brush control See the attached documents for further details on the known herbicide application history.	Question 25 Attachment Q25_Herb Application History.pdf
26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.	<u>Station F Power Plant & Station L Power Plant and Ancillary Facilities/Operations</u> The Station F power plant operated on wood waste from 1901 until 1911 (prior to the investigation period, 1937 to present). PGE operated the Station L Power Plant from 1911 to 1956 on wood waste and oil fuel, and from 1957 to 1964 on oil fuel and natural gas. The wood waste and fuel oil were stored on site. The primary materials that may have been used for equipment maintenance include transformer oil, solvents, denatured alcohol, degreasers, lubricating grease, hydraulic fluid and paint; these materials were likely stored on site during the historical power plants' operations. For further information, see the responses to Questions 16 and 21a. <u>Other PGE Facilities</u> The primary materials/wastes that were or may have been used, stored, or otherwise handled at Station L during PGE's other operations (post-1978 to 1986/2005) include transformer oil, solvents, denatured alcohol, degreasers, lubricating grease, hydraulic fluid, paint, antifreeze, transmission oil, fuel oil, electrical wiring, scrap metals, sandblast grit, analytical chemicals, lead-covered cables, utility power poles, surplus and obsolete oil-filled transformers, and dry surplus equipment. For further information, see the responses to Questions 16 and 21a.	See all Question 15 Attachments Also see all Question 21 Attachments Also see all Question 52 Attachments Also see all Question 62 Attachments

EPA Question	Response	Records/Information Available
	Sanitary Waste During PGE's ownership of Station L, sanitary waste was handled on site with septic tanks/cesspools. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know where, when, or how the septic tanks/cesspools were emptied or maintained at Station L. Station L Remediation After retirement of the Station L power plant in 1975, PGE evaluated several alternatives for the future development of Station L, including donation of the property. PGE decided to donate the northern 18 acres of Station L (Parcels A through F) to OMSI. Title for this portion of Station L passed from PGE to OMSI on 31 December 1986. Because PGE had stored electrical equipment containing PCBs in some areas of Station L, PGE retained the responsibility for cleaning up PCB contamination and for the removal of all ACM on the donated land as a contingency of the OMSI donation. Due to the identification of PCB contamination in the soil at Station L and sediment adjacent to the turbine building, PGE entered into the Voluntary Cleanup Program with the Oregon DEQ in June 1987. In August 1988, PGE entered into a three-phase consent order (DEQ No. ECSR-NWR-88-02) to identify the nature and extent of hazardous substances over the entire Station L property (Parcels A through I) and Stephens Substation (addressed in a separate 104(e) response). During the site investigations and remedial actions from 1986 to 1994, PGE disposed of PCB-containing soil, petroleum hydrocarbon-containing soil, metal-containing soil, PCB-containing sediment, ACM, as well as other PCB- and/or petroleum hydrocarbon-containing materials. The following presents the generalized waste handling procedures: • In general, soil, sediment, oils/fluids, rags/absorbents, and other materials containing PCBs (≥50 ppm) were sealed in barrels and transported directly to the appropriate disposal facility. • In general, soil, oils/fluids, rags/absorbents, solvents, and other materials not contaminated with PCB (<50 ppm) were containerized separately and either transported directly to the appropriate disposal facility or to a PGE waste and used materials handling facility for interim storage prior to disposal/recycling. • In addition, some waste/material was treated during the remedial activities at Station L; see the response to Question 13g for further information: o In 1989, PGE pumped, treated, and discharged the water contents (liquid) from two of the Station L USTs (likely EY-03 and EY-04) into the municipal sanitary sewer. o In 1989, PGE treated (filtered) ACM-contaminated waste water prior to discharging the treated water to the municipal sewer lines under a City of Portland special discharge permit. o In 1990, excavated sediment was dewatered and the removed water was treated (filtered) prior to discharging the treated water into the Willamette River	

EPA Question	Response	Records/Information Available
	under a temporary NPDES permit. o In 1990/1991, approximately 2,650 cubic yards of petroleum-hydrocarbon soil from around the USTs in Parcel A were excavated and moved to the portion of Station L owned by PGE at that time (Parcel H and/or Parcel I). The soil was treated by spreading and aeration from June 1990 to March 1991. o From 1994 to 1998, groundwater beneath Parcel A impacted with BTEX was treated using an air sparging remediation system, thereby reducing the BTEX concentrations in the groundwater. For further information, see the responses to Questions 13g and 16, and the responses and documents for Questions 15, 21a, 21c, 52, and 62. Also see the separate 104(e) response for Stephens Substation, the separate 104(e) response for Harborton Substation, which was historically a PGE waste and used materials handling facility within the Investigation Area, and the supplemental submittal of documentation from other PGE facilities that may have received waste and used materials from Station L (Supplemental Submittal S7).	
27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:	To the best of PGE's knowledge, after reasonable inquiry, wastes and materials from Station L were not purposefully disposed of into the Willamette River. For further information on spills, including one that reached the Willamette River, see the response to Question 62. Employee interviews detailed in the document (Q21c_1987-05-27_Memo_Poss Burial of Capacitors.pdf) attached in response to Question 21c, suggest that carcasses of old capacitors may have been buried at Station L. To the best of PGE's knowledge, after reasonable inquiry, these employees' recollections are mistaken. PGE does not have any corroborating documentation concerning burial of equipment on this property and PGE's historical practice with old transformers, capacitors and other scrap metal materials was to recycle and/or sell the equipment.	See Question 21 Attachment Q21c_1987-05-27_Memo_Poss Burial of Capacitors.pdf
a. the persons with whom the Respondent made such arrangements;	To the best of PGE's knowledge, after reasonable inquiry, companies with whom PGE made arrangements for disposal/recycling/destruction of wastes and/or used material for PGE properties in Oregon are listed in the document (Q40_Waste-Materials Receivers and Carriers.pdf) attached in response to Question 40. Those companies within the Investigation Area are summarized in the attached document (Q27_Waste-Materials Receivers within IA.pdf) and include the following: • Acme Trading & Supply – located at 4927 NW Front Ave, Portland, OR • AGG Enterprises Inc – located at 5555 N Channel Ave #3, Portland, OR • Ash Grove Cement Company – located at 13939 N Rivergate Blvd, Portland, OR • Bingham Willamette (now Sulzer Pumps) – located at 2800 NW Front Ave, Portland, OR • Calbag Metals – located at 2495 NW Nicolai St and 12005 N Burgard Way, Portland, OR	Question 27 Attachment Q27_Waste-Materials Receivers within IA.pdf Also see Question 21 Attachments Q21c_1992-10-6 Soil Incineration.pdf Q21c_1994-07-15 Soils Disposal Non-HW Manifest.pdf Q21c_1994 Soil Certificates.pdf Q21c_1998-02-19 Soils Disposal Non-HW Manifest.pdf Q21c_1998-03-02 Soils Disposal Non-Haz Manifest.pdf Also see Question 40 Attachment Q40_Waste-Materials Receivers and Carriers.pdf

EPA Question	Response	Records/Information Available
	• Cascade General Inc – located at 5555 N Channel Rd, Portland, OR • General Electric Company – located at 2535 NW 28th Ave, Portland, OR • Northwest Natural Gas Co – located at 123 NW Flanders, Portland, OR • Nudleman & Sons – located at 2707 NW Nela, Portland, OR • **Oregon Hydrocarbon/TPS Technologies** – located at 9333 N Harborgate St, Portland, OR • Port of Portland – located at 121 NW Everett Street, Portland, OR • Schnitzer Steel – located at 3200 NW Yeon Ave and 12005 N Burgard Way, Portland, OR • Tyee Construction Company of Oregon – located at 12005 Burgard Way, Portland, OR • Univar – located at 3950 NW Yeon Ave and 10821 N Lombard St, Portland, OR • Western Steel Cast – located at 3070 SW Moody, Portland, OR To the best of PGE's knowledge, after reasonable inquiry, Oregon Hydrocarbons/TPS Technologies (listed above in **bold**) is the only company that has been identified as both within the Investigation Area and having received waste from Station L based on the response and documents attached in response to Question 21. In August 1992, June/July/September 1994, and March 1998, Oregon Hydrocarbons received petroleum hydrocarbon-containing soil from Station L; see the documents (Q21c_1992-10-6 Soil Incineration.pdf, Q21c_1994-07-15 Soils Disposal Non-HW Manifest.pdf, Q21c_1994 Soil Certificates.pdf, Q21c_1998-02-19 Soils Disposal Non-HW Manifest.pdf, and Q21c_1998-03-02 Soils Disposal Non-Haz Manifest.pdf) attached in response to Question 21. The other (non-bold) companies/persons listed above have historically received or currently receive waste and/or used materials from the PGE waste and used materials handling facilities, which may have included waste and/or used materials from Station L. General Electric Company was used as a transformer transfer facility by PGE. It is unknown whether any Station L equipment went through this facility. The Harborton Substation, a historical PGE waste and used materials handling facility, is within the Investigation Area and is addressed in a separate 104(e) response. Also see the supplemental submittal of documentation from other PGE facilities that may have received waste and used materials from the Station L Substation (Supplemental Submittal S7).	
b. every date on which Respondent made such arrangements;	The only company positively identified by PGE as having received waste or used material from the Station L is Oregon Hydrocarbons/TPS Technologies (listed in **bold** in response to Question 27a). In August 1992, July 1994, and March 1998, Oregon Hydrocarbons received petroleum hydrocarbon-containing soil from Station L; see the documents (Q21c_1992-10-6 Soil Incineration.pdf, Q21c_1994-07-15 Soils Disposal Non-HW Manifest.pdf, Q21c_1994 Soil Certificates.pdf, Q21c_1998-02-19 Soils Disposal Non-HW Manifest.pdf, and Q21c_1998-03-02 Soils Disposal Non-Haz Manifest.pdf) attached in response to Question 21. Additional available general PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling are provided in the supplemental submittal of documentation from other	See Question 21 Attachments Q21c_1992-10-6 Soil Incineration.pdf Q21c_1994-07-15 Soils Disposal Non-HW Manifest.pdf Q21c_1994 Soil Certificates.pdf Q21c_1998-02-19 Soils Disposal Non-HW Manifest.pdf Q21c_1998-03-02 Soils Disposal Non-Haz Manifest.pdf

EPA Question	Response	Records/Information Available
	PGE facilities that may have received waste and materials from the Harborton Substation (Supplemental Submittal S7) and the supplemental submittal of general PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling (Supplemental Submittal S6).	
c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all materials involved in each such arrangement;	To the best of PGE's knowledge, after reasonable inquiry, PGE does not know the quantity of, nature of, date(s) of disposal, or location where waste was disposed or recycled during the historical power plants operations. The Station F power plant operated from approximately 1901 to 1911. The Station L power plant operated from 1911 to 1975. To the best of PGE's knowledge, after reasonable inquiry, disposal/recycling facilities with which PGE has made arrangements for disposal/recycling of wastes for PGE properties in Oregon are listed in the document (Q40_Waste-Materials Receivers and Carriers.pdf) attached in response to Question 40. Those companies within the Investigation Area are summarized in the attached document (Q27_Waste-Materials Receivers within IA.pdf). Of those listed, the following is a description of the waste and used materials disposed/recycled at facilities within the Investigation Area: • Acme Trading & Supply – Used (but not obsolete) transformers (solid) and ballasts (solid) • AGG Enterprises Inc. – Mixed non-hazardous waste (various) and recyclables • Ash Grove Cement Company – PCB waste: oil (liquid) with PCBs <50 ppm • Bingham Willamette (now Sulzer Pumps) – Used (but not obsolete) transformers (solid) and oil circuit breakers (solid) • Calbag Metals – Scrap metal (solid) and empty aerosol cans (solid) • Cascade General Inc – Non-hazardous liquid waste/material: mineral oil (liquid) with PCBs <50 ppm • General Electric Company – Oil with PCBs ≥50 ppm (liquid) and obsolete equipment (solid) with trace levels of PCBs ≥50 ppm, used (but not obsolete) transformers (solid) • Northwest Natural Gas Co – Transformer oil (liquid) • Nudleman & Sons – Scrap copper (solid) • **Oregon Hydrocarbon/TPS Technologies** – Solidified contents of USTs (solid) and petroleum hydrocarbon-contaminated soil (solid) • Port of Portland – Used (but not obsolete) transformers (solid) and ballasts (solid) • Schnitzer Steel – Scrap metal (solid) and empty aerosol cans (solid) • Tyee Construction Company of Oregon – Transformers (solid) • Univar – Used transformer/insulating oil (liquid, <1 ppm PCBs), used rags/absorbent material from leaks or spills (solid, >50 ppm PCBs), and used transformer/insulating oil (liquid, ≥50 ppm PCBs) • Western Steel Cast – Transformers (solid) To the best of PGE's knowledge, after reasonable inquiry, Oregon Hydrocarbons/TPS Technologies (listed above in **bold**) is the only company that has been identified as both within the Investigation Area and having received waste from Station L based on the response and	Question 27 Attachment Q27_Waste-Materials Receivers within IA.pdf Also see Question 21 Attachments Q21c_1992-10-6 Soil Incineration.pdf Q21c_1994-07-15 Soils Disposal Non-HW Manifest.pdf Q21c_1994 Soil Certificates.pdf Q21c_1998-02-19 Soils Disposal Non-HW Manifest.pdf Q21c_1998-03-02 Soils Disposal Non-Haz Manifest.pdf Also see Question 40 Attachment Q40_Waste-Materials Receivers and Carriers.pdf

EPA Question	Response	Records/Information Available
	documents attached in response to Question 21. The following summarizes the waste from Station L sent to Oregon Hydrocarbon: • August 1992 – an unknown quantity of petroleum hydrocarbon-containing soil (solid); see the document (Q21c_1992-10-6 Soil Incineration.pdf) attached in response to Question 21. • June/July/September 1994 – approximately 2,134 tons of petroleum hydrocarbon-containing soil (solid); see the documents (Q21c_1994-07-15 Soils Disposal Non-HW Manifest.pdf and Q21c_1994 Soil Certificates.pdf) attached in response to Question 21. • March 1998 – 4.5 tons of petroleum hydrocarbon-containing soil (solid); see the documents (Q21c_1998-02-19 Soils Disposal Non-HW Manifest.pdf and Q21c_1998-03-02 Soils Disposal Non-Haz Manifest.pdf) attached in response to Question 21. The other (non-bold) companies/persons listed above have historically received or currently receive waste and/or used materials from the PGE waste and used materials handling facilities, which may have included waste and/or used materials from Station L. The Harborton Substation, a historical PGE waste and used materials handling facility, is within the Investigation Area and is addressed in a separate 104(e) response. Also see the supplemental submittal of documentation from other PGE facilities that may have received waste and used materials from the Station L Substation (Supplemental Submittal S7).	
d. in general terms, the nature and quantity of the non- hazardous materials involved in each such arrangement;	See the responses to Questions 27a and 27c.	
e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;	See the responses to Questions 27a and 27c.	
f. the owner of the materials involved in each such arrangement, if not Respondent;	OMSI was the owner of Station L Parcels A-F during the 1992, 1994, and 1998 petroleum-hydrocarbon-containing soil removals from those parcels and subsequent disposal at Oregon Hydrocarbons. However, this waste (petroleum hydrocarbon-contaminated soil generated during site investigation borings) was generated by PGE (via their consultant/contractor) because PGE was responsible for the removal of contaminated soil from Station L (Parcels A-F) per the OMSI donation contingency.	
g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;	See the responses to Questions 27a and 27c.	
h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;	See the response to Question 27a.	

EPA Question	Response	Records/Information Available
i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;	See the response to Question 27a.	
j. who selected the location to which the materials were to be disposed or treated;	PGE personnel in charge of environmental matters and consultants. See the response and documents attached for Question 38, as well as the documents attached in response to Question 6g.	See Question 6 Attachments Q06g_Bullseye Articles.pdf Q06g_Distribution and System Planning Information.pdf Q06g_HRIS Structure Info 1982-2005.pdf Q06g_Organizational Charts.pdf See all Question 38 Attachments
k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and	PGE personnel in charge of environmental matters and consultants. See the response and documents attached for Question 38, as well as the documents attached in response to Question 6g.	See Question 6 Attachments Q06g_Bullseye Articles.pdf Q06g_Distribution and System Planning Information.pdf Q06g_HRIS Structure Info 1982-2005.pdf Q06g_Organizational Charts.pdf See all Question 38 Attachments
l. any records of such arrangement and each shipment.	See the response to Questions 27a and 27c.	
28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).	To the best of PGE's knowledge, after reasonable inquiry, the following lists the major surface structures that have existed at different times at Station L during PGE's ownership: <u>Station F Power Plant (approximately 1901 to 1911)</u> • Station F Power Plant Building • Two Conical Cinder Collectors • Machine Shop (blacksmith) • Fuel Sawdust Shed • Sawdust Conveyor • Sawdust and Shavings Bunker <u>Station L Power Plant and Ancillary Facilities/Operations (approximately 1911 to 1975)</u> • Station L Power Plant Building • Hog Fuel Storage Bunker and Piles • Lincoln Substation o Control Building o Transformers o Capacitors o Transmission and Distribution Structures • Tank Farm and Oil AST • Oil Docks	See Question 10 Attachments Q10_Sanborn Maps-Northern.pdf Q10_Sanborn Maps-Southern.pdf Also see all Question 13d, 13e, 13k, 13l, and 13m Attachments Also see Question 15 Attachments Q15_1984-01-27 SERA_Phase I.pdf Q15_1987-07-06 HC Vol PCB Cleanup Plan.pdf Q15_1988-02-29 HC RAP Vol I.pdf Q15_1991-1992 CH2M Helipad Cleanup Documents.pdf Q15_1994-08-09 EPA Site Investigation Report.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf

EPA Question	Response	Records/Information Available
	• Railroads <u>Other PGE Facilities (various times between early 1900s and 1986/1990)</u> • Central Division Garage • Garage Fueling Station • Communication Center • Radio Shop • Microwave Tower • Mobile Radio Building • Welding Shop • Machine Shop • Sandblast Shed • Analytical Lab • Store Room No. 1 • EM&C Storage Building • Public Relations Storage Building • Planer Building • Helicopter Pad and Refueling System • PGE Station L Office • Filter House • Pole Operations Building • Electricians Building • Mobile Oil Storage Tanks • Lumber sheds • Hoist Houses • Paint/Chemical Storage Sheds • Other Small Miscellaneous Storage Sheds • Vacant Buildings For further details, see the response and documents attached for Question 13d. Also see the response to Question 5g, the Sanborn maps (Q10_Sanborn Maps-Northern.pdf and Q10_Sanborn Maps-Southern.pdf) attached in response to Question 10, the response and documents attached for Questions 13e, 13k, 13l, and 13m, and the Station L historical/background information in the reports (Q15_1984-01-27 SERA_Phase I.pdf, Q15_1987-07-06 HC Vol PCB Cleanup Plan.pdf, Q15_1988-02-29 HC RAP Vol I.pdf, Q15_1991-1992 CH2M Helipad Cleanup Documents.pdf, Q15_1994-08-09 EPA Site Investigation Report.pdf, and Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15.	

EPA Question	Response	Records/Information Available
29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.	Historical Station F power plant (1901-1911) operations and Station L power plant operations (1910/1911-1965) included building construction, equipment installation, power generation and distribution, equipment maintenance, equipment decommissioning, and building removal. Other historical PGE operations at Station L (various times up through 1986 on Parcels A through H and up through 2005 on Parcel I) included, but was not limited to, garage operations for fleet vehicles, fueling station, communication center, radio/microwave operations, welding/machine shops, analytical lab, pole storage areas, and equipment/material storage and staging areas. PGE conducted remedial activities at Station L from 1986 to 1998. See the attached documents. Also see the responses to Questions 5g and 16, as well as the responses and documents attached for Questions 13, 15, and 21.	Question 29 Attachments Q29_Substation Lifecycle.pdf Q29_Operations-Waste Schematic.xls Also see all Question 13 Attachments Also see all Question 15 Attachments Also see all Question 21 Attachments
30. Provide a brief description of the nature of Respondent's operations at each location on each Property including:		
a. the date such operations commenced and concluded; and	Operations varied during the period of PGE's ownership: • Station F Power Plant operations on Parcel D occurred from approximately 1901 to 1911 • Station L Power Plant and Lincoln Substation Operations on Parcel C occurred from 1910/1911 to 1975 (power plant was placed in "cold" standby in 1965 and formally retired in 1975) • Other PGE operations (e.g., storage, communications center, motor pool garage, etc.) occurred through 1986/2005. PGE conducted activities on Parcels A through I between approximately 1901 to 1986/2005, but the activities and durations varied by parcel; see the response to Question 5f for the years that PGE operated on each of the Station L parcels. In addition, PGE performed remedial activities at Station L from approximately 1986 to 1998. For a more detailed description of the various PGE operations and activities, see the responses to Questions 5g, 15, 16, and 21. See the response for Question 13k for a discussion of modifications at Station L over time.	
b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each	<u>Station F Power Plant & Station L Power Plant and Ancillary Facilities/Operations</u> PGE generated power at the Station F power plant using wood waste from 1901 until 1911 (prior to the investigation period, 1937 to present). PGE generated power at the Station L Power Plant using wood waste and oil from 1911 to 1956 and using oil and natural gas from 1957 to 1964. PGE operated Lincoln Substation for power distribution from approximately 1910/1911 to 1965. <u>Other PGE Facilities</u>	See Question 29 Attachments Q29_Substation Lifecycle.pdf Q29_Operations-Waste Schematic.xls

EPA Question	Response	Records/Information Available
	Other PGE operations included a fleet garage, garage fueling station, electricians building, machine shop, welding shop, communication center, radio shop, sandblast shed, EM&C storage building, analytical lab, public relations storage building, helicopter pad and fueling system, tank farm, scrap steel pile, chemical/paint storage shed, lead-covered cable storage area, utility power pole storage areas, transformer storage areas, equipment storage areas, and other various smaller storage structures. These other operations occurred at various times on different parcels but ceased by 1986 on Parcels A through H and by 2005 on Parcel I. Station L Remediation After retirement of the Station L power plant in 1975, PGE evaluated several alternatives for the future development of Station L, including donation of the property. PGE decided to donate the northern 18 acres of Station L (Parcels A through F) to OMSI. Title for this portion of Station L passed from PGE to OMSI on 31 December 1986. Because PGE had stored electrical equipment containing PCBs in some areas of Station L, PGE retained the responsibility for cleaning up PCB contamination and for the removal of all ACM on the donated land as a contingency of the donation. Due to the identification of PCB contamination in the soil at Station L and sediment adjacent to the turbine building, PGE entered into Oregon DEQ's Voluntary Cleanup Program in June 1987. In August 1988, PGE entered into a three-phase consent order (DEQ No. ECSR-NWR-88-02) to identify the nature and extent of hazardous substances over the entire Station L property (Parcels A through I) and Stephens Substation (addressed in a separate 104(e) response). During the site remedial activities from approximately 1986 to 1994, PGE disposed of PCB-containing soil, petroleum hydrocarbon-containing soil, metal-containing soil, PCB-containing sediment, ACM, as well as other PCB- and/or petroleum hydrocarbon-containing materials. PGE also treated the groundwater under Parcel A, treated (filtered) asbestos-containing decontamination/rinse water, treated (filtered) water removed from the excavated sediment, treated the water contents of two USTs, and treated (through spreading and aeration) soil from Parcel A. In addition, PGE placed a sediment cap over the sediment adjacent to the turbine building, which PGE continues to monitor. For further details and information, see the responses to Questions 5g, 13d, 13g, 13k, 15, 16, and 21, as well as the documents attached in response to Question 29.	
31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.	See the responses to Questions 5g, 13d, and 13k.	
32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these	Station F Power Plant & Station L Power Plant and Ancillary Facilities/Operations The Station F power plant operated on wood waste from 1901 until 1911 (prior to the investigation period, 1937 to present). PGE operated the Station L Power Plant from 1911 to 1956 on wood waste and oil fuel,and from 1957 to 1964 on oil fuel and natural gas. The wood waste and fuel oil were stored on site. The primary materials that may have been used for	

EPA Question	Response	Records/Information Available
operations.	equipment maintenance include transformer oil, solvents, denatured alcohol, degreasers, lubricating grease, hydraulic fluid and paint; these materials were likely stored on site during the historical power plants' operations. Other PGE Facilities The primary materials/wastes that were or may have been used, stored, or otherwise handled at Station L during PGE's other operations (post-1978 to 1986/2005) include transformer oil, solvents, denatured alcohol, degreasers, lubricating grease, hydraulic fluid, paint, antifreeze, transmission oil, fuel oil, electrical wiring, scrap metals, sandblast grit, analytical chemicals, lead-covered cables, utility power poles, surplus and obsolete oil-filled transformers, and dry surplus equipment. For further information, the responses to Questions 13g and 16, and the responses and documents for Questions 5g, 13d, 13k, 16, and 21.	
33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.	The products/materials currently used at PGE properties within Oregon are listed in the attached document (Q33_EMC List.pdf). Material Safety Data Sheets (MSDS) for these products/materials are provided in a supplemental submittal (Supplemental Submittal S2). Products/materials used in the past are similar to those used currently at PGE properties.	Question 33 Attachment Q33_EMC List.pdf
34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:	To the best of PGE's knowledge, after reasonable inquiry, PGE does not know and was unable to locate any records describing the cleaning or maintenance of equipment and machinery at Station L. Maintenance and cleaning activities likely included routine inspections and cleaning of electrical equipment; routine visual inspections and operations tests on lighting systems; replacement of obsolete equipment, as needed; and inspection of the control systems as needed.	
a. the types of materials used to clean/maintain this equipment-machinery;	The primary materials that may have been used for equipment maintenance include transformer oil, solvents, denatured alcohol, degreasers, lubricating grease, hydraulic fluid, and paint.	
b. the monthly or annual quantity of each such material used.	To the best of PGE's knowledge, after reasonable inquiry, PGE does not know of any records describing the quantity of maintenance materials used at Station L.	
c. the types of materials spilled in Respondent's operations;	Materials potentially spilled during operations include oil and fluid from equipment spills or leaks.	
d. the materials used to clean up those spills;	A solvent (1500) was used to remove the oil that spilled onto the turbine deck during the cleanup of the 1971 transformer release; see the document (Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf) attached in response to Question 62. The following are PGE general spill response procedures (post-1978). • Minor equipment spills or leaks were cleaned up using sorbent materials. • Major spills were cleaned up using sorbent materials, berms, and necessary equipment.	See Question 19 Attachments Q19_1975 SPCC.pdf Q19_1980 SPCC.pdf Also see Question 62 Attachment Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf

EPA Question	Response	Records/Information Available
	For further details, see the response and documents for Question 19 and the response to Question 21.	
e. the methods used to clean up those spills; and	The document (Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf) attached in response to Question 62, which specifically concerns the 1971 transformer release, includes limited information on the methods used to clean up that release (cleaning the deck with solvent). After 1978, minor equipment spills or leaks were cleaned up they occurred by wiping up the oil/fluid with on-hand absorbent materials. Major spills were immediately reported to the System Control Center. PGE's spill response crew was dispatched to clean up the oil. Soiled material was placed into a marked barrel and disposed of properly. For further details, see the response and documents for Question 19 and the response to Question 21.	See Question 19 Attachments Q19_1975 SPCC.pdf Q19_1980 SPCC.pdf Also see Question 21 Attachments Also see Question 62 Attachment Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf
f. where the materials used to clean up those spills were disposed of.	To the best of PGE's knowledge, after reasonable inquiry, PGE does not know where the materials used to clean up spills at Station L were disposed prior to 1986. In general after 1986, materials potentially contaminated with PCBs were sealed in barrels and transferred to PGE's waste and used materials handling facility (historically at Harborton Substation, Sellwood Substation, or PSC). If not ascertainable from testing the equipment generating the spill, these wastes are tested to determine a disposal location appropriate for its PCB concentration once they are received at the waste and used materials handling facility. Materials containing PCBs are disposed at different facilities depending on the concentration of the originally spilled materials, if known, or the concentration in the waste materials. Wastes not contaminated with PCBs are containerized separately and transferred to PGE's waste and used materials handling facility (historically at Harborton Substation, Sellwood Substation, or PSC; currently at PSC). For further details, see the response and documents for Question 21.	See all Question 21 Attachments
35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.	The document (Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf) attached in response to Question 62, which specifically concerns the 1971 transformer release, includes limited information on the methods used to clean up that release (cleaning the deck with solvent). To the best of PGE's knowledge, after reasonable inquiry, PGE does not know the methods used to clean up spills at Station L prior to 1975/1978. After 1978, minor equipment spills or leaks were cleaned up they occurred by wiping up the oil/fluid with on-hand absorbent materials. Major spills were immediately reported to the PGE System Control Center. PGE's spill response crew was dispatched to clean up the oil. Soiled material was placed into a marked barrel and disposed of properly. For further details, see the response and documents for Question 19 and the response to Question 21.	See Question 19 Attachments Q19_1975 SPCC.pdf Q19_1980 SPCC.pdf Also see Question 62 Attachment Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf
36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following	PGE operational waste varies month to month and year to year. The following is a summary of the type of wastes generated from the historical operations and remedial activities at Station L: Remediation waste includes: • Soil, asphalt, gravel, debris, other materials contaminated with PCBs and petroleum	See all Question 15 Attachments Also see all Question 21 Attachments Also see Question 33 Attachment

EPA Question	Response	Records/Information Available
information: a. its physical state; b. its nature and chemical composition; c. its color; d. its odor. e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.	hydrocarbons – solid, petroleum hydrocarbon- and PCB-containing, grey/black/brown, petroleum hydrocarbon odor, more than 13,000 tons, 1986 to 1994 • Sediment, debris, carbon, and mixed media contaminated with PCBs – solid, PCB-containing, grey/black/brown, sweet odor, 17 tons of sediment/debris and 23.5 tons of carbon/mixed media, 1990 • Soil, asphalt, gravel, debris, other materials contaminated with petroleum hydrocarbons and/or metals – solid, petroleum hydrocarbon- and/or metal-containing, grey/black/brown, petroleum hydrocarbon odor, more than 3,000 tons, 1986 to 2001 • ACM – solid, asbestos containing, white, no odor, approximately 300 tons, 1987 to 1995 • RCRA waste (e.g., ignitable petroleum hydrocarbon waste, halogenated solvents, and/or non-halogenated solvents) – liquid; petroleum hydrocarbons, solvents, and/or non-regulated cleaning solution; black/dark brown; petroleum hydrocarbon odor; approximately 20,469 lbs and approximately 5,414 gallons; 1987 to 1994 • Treated water contents of two USTs – liquid, water, unknown, unknown, unknown, 1989 • Treated (filtered) water from ACM removal – liquid, water, none, none, approximately 62,750 gallons, 1989 • Treated (filtered) water from sediment dewatering and water treatment facility liquid, water, none, none, approximately 535,700 gallons, 1990 • Tank rinsate water – liquid, water with phosphates, PCBs (<50 ppm), and asbestos, unknown, unknown, more than 250 gallons, 1986-1994 • Mobile Tank Contents – liquid, water, unknown, unknown, unknown, 2006 • Soils, gravel, and absorbent removed in response to spills or leaks – solid, petroleum hydrocarbon- and/or PCB-containing, soil, black, petroleum hydrocarbon- and/or sweet odor, various, 1986 to 1993 General materials/wastes not contaminated with PCBs include: • Solvents prior to site remediation beginning in 1986 – liquid, oil-based chemical solvents, petroleum hydrocarbon smell, unknown quantity, early 1900s to 1986 • Batteries – solid, alkaline/zinc-carbon/lithium-based batteries, no odor, unknown quantity, early 1900s to 1994 • Scrap metal – solid, metallic (e.g., steel), none to metallic odor, unknown quantity, early 1900s to 1986 • Light bulbs – solid, incandescent and fluorescent light bulbs, no odor, unknown quantity, early 1900s to 1994 • General garbage – mixed composition, various colors, various odors, unknown quantity, early 1900s to 1994 • Construction debris – mixed composition, various colors, various odors, unknown quantity, early 1900s to 1994 • Soils removed during excavation for equipment/building demolition/installation – solid, soil, brown, organic odor, unknown, early 1900s to 1994 • Used/excess lubricants, oils, and other fluids – liquid, petroleum hydrocarbons, various, petroleum hydrocarbon odor, unknown, early-mid 1900s • Obsolete equipment (e.g., transformers, capacitors) – solid, metal, metallic/petroleum hydrocarbon odor, unknown, early-mid 1900s	Q33_EMC List.pdf Also see all Question 62 Attachments

EPA Question	Response	Records/Information Available
	• Rags used to clean equipment – solid, fabric material, various, alcohol-petroleum hydrocarbon odor, unknown, early-mid 1900s • Absorbents used to clean up leaks or spills – solid, absorbent material, various, petroleum hydrocarbon odor, unknown, early-mid 1900s • Ballasts – solid, metallic, electrical lamp component, various, no odor, unknown, early-mid 1900s General materials/wastes potentially contaminated with PCBs (after 1929, the earliest generalized marketing of PCBs in the United States) include: • Used/excess lubricants, oils, and other fluids – liquid, petroleum hydrocarbons, various, petroleum hydrocarbon odor, unknown, mid-1900s to 1986 • Obsolete equipment (e.g., transformers, capacitors) – solid, metal, metallic/petroleum hydrocarbon odor, unknown, mid-1900s to 1987 • Rags used to clean equipment – solid, fabric material, various, alcohol-petroleum hydrocarbon odor, unknown, mid-1900s to 1986 • Absorbents used to clean up leaks or spills – solid, absorbent material, various, petroleum hydrocarbon odor, unknown, mid-1900s to 1993 • Ballasts – solid, metallic, electrical lamp component, various, no odor, unknown, mid-1900s to 1987 Also see the MSDS documents provided in a supplemental submittal (Supplemental Submittal S2), the response to Question 16, the responses and documents attached for Questions 15, 21, 33, and 62. Also see the separate 104(e) response for the Harborton Substation (historically a PGE waste and used materials facility) and the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from Station L (Supplemental Submittal S7).	
37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.	See the response and documents for Question 29.	See all Question 29 Attachments
38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's	See the attached documents for a listing of those responsible for environmental matters 1980 - present. See the attached 1993 and 1997 Job Descriptions for Environmental Services Manager. See the attached document for management structural information 1982-2005. Also see the documents attached in response to Question 6g.	Question 38 Attachments Q38_Res. For Environmental Matters.pdf Q38_Mgr. Env. Svc. Job description – 1993.pdf Q38_Mgr. Env. Svc. Job description – 1997.pdf Q38_HRIS Structure Info. 1982-2005.pdf Also see Question 6 Attachments

EPA Question	Response	Records/Information Available
wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.		Q06g_Bullseye Articles.pdf Q06g_Distribution and System Planning Information.pdf Q06g_HRIS Structure Info 1982-2005.pdf Q06g_Organizational Charts.pdf
39. For each type of waste describe Respondent's contracts, agreements or other arrangements for its disposal, treatment, or recycling.	To the best of PGE's knowledge, after reasonable inquiry, the available contracts, agreements, or other arrangements for disposal, treatment, or recycling for Station L are provided with the waste and materials disposal, treatment, and recycling documentation attached in response to Questions 21 and the reports attached in response to Question 15. Waste disposal permits are attached in response to Question 52. Additional available general PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling are provided in the Harborton Substation 104(e) response (historically a PGE waste and used materials handling facility within the Investigation Area), the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from Station L (Supplemental Submittal S7), and the supplemental submittal of general PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling (Supplemental Submittal S6).	See Question 15 Attachments All Question 15 Reports See all Question 21 Attachments Also see all Question 52 Attachments
40. Provide copies of such contracts and other documents reflecting such agreements or arrangements, including but not limited to: a. state where Respondent sent each type of its waste for disposal, treatment, or recycling; b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request); c. if Respondent transported any of its	To the best of PGE's knowledge, after reasonable inquiry, the companies/persons with whom PGE has made arrangements for the disposal/recycling/destruction of wastes and/or used material for PGE properties in Oregon are listed in the attached document (Q40_Waste-Materials Receivers and Carriers.pdf), some of which received waste and/or used material from Station L during PGE's historical operations and remediation. See the response and documents attached for Question 21 and the reports attached in response to Question 15. To the best of PGE's knowledge, after reasonable inquiry, the available contracts, agreements, or other arrangements for disposal, treatment, or recycling for Station L are provided with the waste and materials disposal, treatment, and recycling documentation attached in response to Questions 21 and the reports attached in response to Question 15. Waste disposal permits are attached in response to Question 52. Also see the response and document attached in response to Question 27. Additional available general PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling are provided in the Harborton Substation 104(e) response (historically a PGE waste and used materials handling facility within the Investigation Area), the supplemental submittal of documentation from other PGE facilities that may have received waste and	Question 40 Attachment Q40_Waste-Materials Receivers and Carriers.pdf See Question 15 Attachments All Question 15 Reports Also see all Question 21 Attachments Also see Question 27 Attachment Q27_Waste-Materials Receivers within IA.pdf Also see all Question 52 Attachments

EPA Question	Response	Records/Information Available
wastes away from its operations, please so indicate; d. for each type of waste specify which Waste Carrier picked it up; e. indicate the ultimate disposal/recycling/treatment location for each type of waste. f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and g. state the basis for and provide any documents supporting the answer to the previous question.	materials from Station L (Supplemental Submittal S7), and the supplemental submittal of general PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling (Supplemental Submittal S6).	
41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to: a. the nature and chemical composition of each type of waste; b. the dates on which those wastes were disposed; c. the approximate quantity of those wastes disposed by month and year; d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre-treatment plant, Publicly Owned Treatment Works (POTW), etc.); and e. whether and what pretreatment was provided.	Lavatories and a stormwater drainage system, including catch basins and dry wells, were located at Station L. • During PGE's ownership of Station L, sanitary waste was handled on site by septic tanks/cesspools. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know where, when, or how the septic tanks/cesspools were emptied or maintained at Station L. For further details, see the responses to Questions 13i and 18. • From approximately 1954/1957 until the parcels were sold, stormwater that did not infiltrate into the ground at Station L was managed through a system of drywells, catch basins, stormwater sewer lines, and an oil water separator. For further details, see the responses to Question 13i and 18. To the best of PGE's knowledge, after reasonable inquiry, PGE is unaware of the intentional disposal of any waste, material, or process residue into the Station L stormwater system and is unaware of the discharge of any waste, material, or process residue from the stormwater system to the Willamette River during PGE's ownership. • There were dry wells associated with the Central Division Garage. To the best of PGE's knowledge, after reasonable inquiry, PGE is unaware of the intentional disposal of any waste, material, or process residue into the garage drywells. In addition, PGE discharged water into the municipal sewer in 1989: • To the best of PGE's knowledge, after reasonable inquiry, an unknown volume of treated water from two Station L USTs were discharged to the municipal sanitary sewer. To the best of PGE's knowledge, after reasonable inquiry, PGE also	

EPA Question	Response	Records/Information Available
	discharged the contents of the 226 waste drums that had been stored in the HP boiler room basement. For further details, see the responses to Questions 13g, 21, and 50. • A total of approximately 62,750 gallons of treated (filtered) ACM-contaminated waste water to the municipal sanitary sewer lines under a City of Portland special discharge permit in 1989. During the discharge activities, asbestos-containing waster was inadvertently discharged to the sewer due to an apparent failure in the filtration system. For further details, see the responses to Questions 13g, 15, 21, and 51. For spills and releases, see the response to Question 62.	
42. Identify any sewage authority or treatment works to which Respondent's waste was sent.	To the best of PGE's knowledge, after reasonable inquiry, the municipal sanitary sewer to which the ACM-containing water was inadvertently discharged in 1989 flows to the City of Portland Columbia Boulevard Wastewater Treatment Plant. See the responses to Question 41.	
43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.	To the best of PGE's knowledge, after reasonable inquiry, there were no other settling tanks or pretreatment system sludges or other treatment wastes resulting from PGE operations or remedial activities at Station L. See the response to Question 41 for information on the septic tanks/cesspools that serviced Station L's sanitary needs and the treatment wastes from the ACM remedial activities in 1989.	
44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.	Not applicable. To the best of PGE's knowledge, after reasonable inquiry, PGE did not engage in ship building, retrofitting, maintenance, or repair activities at Station L.	
45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.	Not applicable. To the best of PGE's knowledge, after reasonable inquiry, PGE did not engage in ship building, retrofitting, maintenance, or repair activities at Station L.	

EPA Question	Response	Records/Information Available
46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.	Not applicable. To the best of PGE's knowledge, after reasonable inquiry, PGE did not engage in ship building, retrofitting, maintenance, or repair activities at Station L.	
47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.	PGE had oil-filled equipment on various portions of the Station L property including Station L Power Plant equipment (early 1900s to 1975), Lincoln Substation equipment (early 1900s to 1975/1986), and stored electrical equipment (from sometime prior to 1966 to 1986/2005). PCB-containing oils were used in electrical equipment (i.e., capacitors and transformers) at Station L from sometime after 1929, the earliest generalized marketing of PCBs in the United States, until site closure in 1975. Insulating oil (a type of mineral oil) in the other electrical equipment at the site (e.g., circuit breakers and transformers) may have contained PCBs as a result of cross-contamination during oil replacement and retrofitting. The attached document (Q21a_1986-11-07 Eq list & PCB results.pdf) lists the oil-filled substation equipment at Station L (likely Lincoln Substation) in 1986. The transformer capacity records provided in a supplemental submittal (Supplemental Submittal S8) list the power generating equipment at Station L from 1936 to 1978, some of which may have been located in Stephens Substation since it was originally considered part of Station L. Other oil-filled equipment transportation, disposal, or cleaning documents include: • In 1979, a capacitor from Station L (may have actually been from Stephens Substation) and multiple capacitors from several PGE locations outside of the Investigation Area (e.g., Sellwood, Progress, and Urban Substations) were stored at the EM&C storage yard within Station L prior to disposal at Arlington Landfill; see the document (Q21c_1979-04-03 Invoice.pdf) attached in response to Question 21c. • In 1984, to the best of PGE's knowledge, after reasonable inquiry, approximately 6,000 gallons of PCB-containing oil, drained from electrical equipment and/or USTs and stored in a mobile storage skid in the east side yard at Station L, was disposed at the Union Electric Co; see the document (Q21c_1984-03-07 PCB Disposal.pdf) attached in response to Question 21c. • In 1986, PGE cleaned the oil residue on the evaporation tray of a transformer, disposing of the cleaning rags/pads at the Arlington Landfill; see the document (Q21c_1986-07-29 PCB trans report.pdf) attached in response to Question 21c. • In 1986, two non-leaking capacitors that had been stored in the apprentice training yard at Station L were disposed of at ENSCO, after interim storage at PSC; see the document (Q21c_1986-10-16 PCB trans report.pdf) attached in response to Question	See Question 15 Attachments Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf Q15_1994-08-09 EPA Site Investigation Report.pdf Also see Question 21 Attachments Q21a_1986-11-07 Eq list & PCB results.pdf Q21c_1979-04-03 Invoice.pdf Q21c_1984-03-07 PCB Disposal.pdf Q21c_1986-04-22 PCB trans report.pdf Q21c_1986-07-29 PCB trans report.pdf Q21c_1986-10-16 PCB trans report.pdf Q21c_1986-11-06 Spill Disposal.pdf Q21c_1987-03-30 PCB trans report.pdf Also see Question 50 Attachments Q50_1988-08-03 DEQ Order of Consent.pdf Q50_1991-04-17 Cert of Completion for Phase I & II.pdf Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf Q50_1993-11-16 DEQ Order of Completion.pdf Q50_1994-09-26 Phase III ROD.pdf Also see Question 51 Attachments Q51_1986-04-18&30 Spill Correspondances.pdf Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf Q51_1986-10-14 EPA Inspection PCB Violations.pdf Q51_1986-11-14 EPA - TSCA Violation.pdf Q51_1986-11-19 Sta L Memo_Spill.pdf Q51_1986-12-03 Sta L Spill Procedures.pdf Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf

EPA Question	Response	Records/Information Available
	21c. • In 1987, a non-leaking capacitor that had been stored at the EM&C yard at Station L was transported to PSC and placed in stock or reinstalled elsewhere; see the document (Q21c_1987-03-30 PCB trans report.pdf) attached in response to Question 21c. To the best of PGE's knowledge, after reasonable inquiry, the following summary incorporates all known and available information with respect to specific, known PCB-containing releases at Station L: • 3 April 1971 - To the best of PGE's knowledge, after reasonable inquiry, approximately 2 gallons of PCB-containing oil (askarel oil >500 ppm) were released onto the transformer storage area platform, located at the southwest corner of the turbine building, and to the soil and vegetation beside the platform (Willamette shoreline) when a stored transformer (KX17) failed. PGE personnel cleaned up the spill on the platform using a solvent (1500) to remove the oil. Winter river flooding and rains apparently released the PCB-contaminated soil beside the platform to the river. See the PGE memorandums related to this 1971 spill (Q62_1987-06-15 Memo on Historical PCB.pdf, Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf, Q62_1987-06-24_PGE Phone Memo_1971 spill.pdf) attached in response to Question 62. This release to the Willamette River, as well as several upland (soil) PCB-containing oil releases, were discovered in 1986 during site investigations of Station L conducted by PGE to fulfill the OMSI donation contingency (Parcels A-F were donated to OMSI in December 1986 with the contingency that PGE would cleanup all soils contaminated with PCBs and other materials). The releases were reported to the Oregon DEQ and the USEPA. PGE entered Oregon DEQ's Voluntary Cleanup Program in 1987. In August 1988, PGE entered into a three-phase consent order (DEQ No. ECSR-NWR-88-02) to identify the nature and extent of hazardous substances over the entire Station L property (Parcels A through I) and Stephens Substation (addressed in a separate 104(e) response); see the document (Q50_1988-08-03 DEQ Order of Consent.pdf) attached in response to Question 50. Under Phase I and Phase II consent order requirements, PGE completed the remediation of PCB-contaminated river sediments in 1990 (removal of sediments to 1 ppm and capping of the remaining sediment). In April 1991, the Oregon DEQ issued a certificate of completion indicating that PGE had met the Phase I and Phase II consent order requirements; see the document (Q50_1991-04-17 Cert of Completion for Phase I & II.pdf) attached in response to Question 50. Additional upland soil releases were discovered during the Phase III site investigations, including a release from a leaking UST; see the attached document (Q62_1989-12-12 DEQ LUST Info.pdf). Upland soil at Station L was remediated for	Also see Question 62 Attachments Q62_1987-06-15 Memo on Historical PCB.pdf Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf Q62_1987-06-24_PGE Phone Memo_1971 spill.pdf Q62_1989-12-12 DEQ LUST Info.pdf Q62_1986-04-18 Spill Report.pdf Q62_1986-04-30 Spill Report.pdf Q62_1986-09-18_1701 SE Water.pdf Q62_1986-11-06 Oil Spill Report.pdf Q62_1987-01-28 Oil Spill Questionaire.pdf Q62_1987-03-16 Oil Spill Questionaire.pdf Q62_1988-06-07 Oil Spill Questionaire.pdf Q62_1993-09-13 Oil Spill Report.pdf

EPA Question	Response	Records/Information Available
	PCBs (to 1 ppm), PAHs, TPH, VOCs, and metals. Under Phase III consent order requirements, PGE completed the remediation of the uplands portion of Station L in 1994. See response and documents (Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf, Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf, and Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached for Question 15. In June 1991, PGE received a "NFA" determination for the USTs at Station L; see the document (Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf) attached in response to Question 50. In November 1993, the Oregon DEQ issued an Order of Completion for Station L Phase III; see the document (Q50_1993-11-16 DEQ Order of Completion.pdf) attached in response to Question 50. In September 1994, PGE received a final "NFA" for Station L in Oregon DEQ's Station L Phase III ROD; see the document (Q50_1994-09-26 Phase III ROD.pdf) attached in response to Question 50. The USEPA completed a Site Investigation of Station L in August 1994; see the document (Q15_1994-08-09 EPA Site Investigation Report.pdf) attached in response to Question 15. Based on their site investigation and other pertinent information, the USEPA found it appropriate to refer to state authority for Station L and did not anticipate further investigation for Station L under the Federal Superfund Program. Also see the responses and documents for Questions 15 and 21. • 18 April 1986 – Approximately 5-25 gallons of PCB-containing oil (91-107 ppm) from an oil tank spilled onto gravel in the Station L tank farm; see the document (Q62_1986-04-18 Spill Report.pdf) attached in response to Question 62. The spill occurred during the transfer of insulating oil into a holding tank. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD 86-203), contained, and cleaned up (including the removal and disposal of the PCB-containing gravel and soil. The PCB and petroleum hydrocarbon-containing soil/gravel was disposed of at the Arlington Landfill after interim storage at PSC, a PGE waste and used materials handling facility; see the document (Q21c_1986-04-22 PCB trans report.pdf) attached in response to Question 21c. Also see the response and documents (Q51_1986-04-18&30 Spill Correspondances.pdf, Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf, Q51_1986-10-14 EPA Inspection PCB Violations.pdf, Q51_1986-11-14 EPA - TSCA Violation.pdf, Q51_1986-11-19 Sta L Memo_Spill.pdf, Q51_1986-12-03 Sta L Spill Procedures.pdf, Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf, Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf, Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf, and Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf) attached for Question 51. • 30 April 1986 – Approximately 1 gallon of PCB-containing oil (66 ppm) from an oil tank spilled onto gravel in the Station L tank farm; see the document (Q62_1986-04-30 Spill Report.pdf) attached in response to Question 62. The spill occurred during the PCB-containing oil decontamination activities by Sun Ohio Corporation. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD 86-178),	

EPA Question	Response	Records/Information Available
	contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the PCB and petroleum hydrocarbon-containing soil/gravel was likely disposed of at Arlington Landfill after interim storage at a PGE waste and used materials handling facility. Also see the response and documents (Q51_1986-04-18&30 Spill Correspondances.pdf, Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf, Q51_1986-10-14 EPA Inspection PCB Violations.pdf, Q51_1986-11-14 EPA - TSCA Violation.pdf, Q51_1986-11-19 Sta L Memo_Spill.pdf, Q51_1986-12-03 Sta L Spill Procedures.pdf, Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf, Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf, Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf, and Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf) attached for Question 51. • 18 September 1986 – Approximately 60 gallons of PCB-containing oil (0.4 ppm) were released into the gravel and soil at PGE's Market Street Garage when a UST underground oil pipe ruptured; see the document (Q62_1986-09-18_1701 SE Water.pdf) attached in response to Question 62. The released oil drained into two dry wells in the garage parking lot. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD 86-483), contained, and cleaned up (including the PCB-containing absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB and petroleum hydrocarbon-containing absorbent was likely disposed of at the Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 6 November 1986 – Approximately 2 gallons of PCB-containing oil (approximately 300 ppm) from Oil Storage Tank #6 were spilled onto the gravel in the Station L tank farm; see the document (Q62_1986-11-06 Oil Spill Report.pdf) attached in response to Question 62. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). The PCB and petroleum hydrocarbon-containing soil/gravel was disposed of at the Arlington Landfill after interim storage at Sellwood Substation, a PGE waste and used materials handling facility; see the document (Q21c_1986-11-06 Spill Disposal.pdf) attached in response to Question 21. • 28 January 1987 – Approximately 10-15 gallons of PCB-containing oil (77 ppm) were released onto the gravel and migrated to surface water within the Station L tank farm; see the document (Q62_1987-01-28 Oil Spill Questionaire.pdf) attached in response to Question 62. The spill occurred when a tanker truck leaked while transferring oil to containers within the tank farm. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel, soil, and absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB- and petroleum hydrocarbon-containing soil/gravel/absorbent was likely disposed of at Arlington Landfill after interim storage at a PGE waste and used materials handling facility. Confirmation sampling was conducted to ensure cleanup; the confirmation composite soil sample had a PCB	

EPA Question	Response	Records/Information Available
	concentration of 0.32 ppm. • 16 March 1987 – Approximately 5 gallons of PCB-containing oil (20 ppm) spilled onto gravel in the Station L tank farm; see the document (Q62_1987-03-16 Oil Spill Questionaire.pdf) attached in response to Question 62. The spill occurred when the oil shifted in a tanker and spilled out of the top lid during filling activities. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the petroleum hydrocarbon-containing soil/gravel was likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. Confirmation soil sampling results were all less than 1 ppm PCB. • 23 April 1987 – Approximately 45 gallons of PCB-containing oil (1 ppm) were released from a pole-mounted transformer onto the gravel in the Station L storage yard when a truck struck the pole. To the best of PGE's knowledge, after reasonable inquiry, the petroleum hydrocarbon-containing soil/gravel was likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 7 June 1988 – Approximately 0.03 gallons of PCB-containing insulating oil (35 ppm) and water from an emptied 5 kVA transformer were released onto the asphalt at Station L; see the document (Q62_1988-06-07 Oil Spill Questionaire.pdf) attached in response to Question 62. The spill was caused when thieves tipped over a training transformer (empty with some water inside). The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB- and petroleum hydrocarbon-containing absorbent was likely disposed of at Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 13 September 1993 – Approximately 1 gallon of PCB-containing oil (9 ppm) from a concrete fuel tank spilled onto gravel; see the document (Q62_1993-09-13 Oil Spill Report.pdf) attached in response to Question 62. The spill occurred while EMCON (a PGE contractor) was sampling the tank, which was believed to have been empty. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the approximately 8 cubic feet of petroleum hydrocarbon-containing soil/gravel were likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility.	

EPA Question	Response	Records/Information Available
48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.	See the response to Question 47.	
a. the manufacturer and serial number of each transformer; b. the quantity of oil in each transformer; c. the concentrations of PCB contained in the transformer oil; d. the time period or periods in which these transformers were sent to the Property;	PGE had oil-filled equipment on various portions of the Station L property including Station L Power Plant equipment (early 1900s to 1975), Lincoln Substation equipment (early 1900s to 1975/1986), and stored electrical equipment (from sometime prior to 1966 to 1986/2005). PCB-containing oils were used in electrical equipment (i.e., capacitors and transformers) at Station L from sometime after 1929, the earliest generalized marketing of PCBs in the United States, until site closure in 1975. Insulating oil (a type of mineral oil) in the other electrical equipment at the site (e.g., circuit breakers and transformers) may have contained PCBs as a result of cross-contamination during oil replacement and retrofitting. The attached document (Q21a_1986-11-07 Eq list & PCB results.pdf) lists the oil-filled substation equipment at Station L (likely Lincoln Substation) in 1986. The transformer capacity records provided in a supplemental submittal (Supplemental Submittal S8) list the power generating equipment at Station L from 1936 to 1978, some of which may have been located in Stephens Substation since it was originally considered part of Station L. Also see the document (Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf) attached in response to Question 62, which includes limited information on the transformer associated with the April 1971 spill. Other oil-filled equipment transportation or disposal documents include: • In 1979, a capacitor from Station L (may have actually been from Stephens Substation) and multiple capacitors from several PGE locations outside of the Investigation Area (e.g., Sellwood, Progress, and Urban Substations) were stored at the EM&C storage yard within Station L prior to disposal at Arlington Landfill; see the document (Q21c_1979-04-03 Invoice.pdf) attached in response to Question 21c. • In 1986, two non-leaking capacitors that had been stored in the apprentice training yard at Station L were disposed of at ENSCO, after interim storage at PSC; see the document (Q21c_1986-10-16 PCB trans report.pdf) attached in response to Question 21c. • In 1987, a non-leaking capacitor that had been stored at the EM&C yard at Station L was transported to PSC and placed in stock or reinstalled elsewhere; see the document (Q21c_1987-03-30 PCB trans report.pdf) attached in response to Question 21c.	See Question 21 Attachments Q21a_1986-11-07 Eq list & PCB results.pdf Q21c_1979-04-03 Invoice.pdf Q21c_1986-10-16 PCB trans report.pdf Q21c_1987-03-30 PCB trans report.pdf Also see Question 62 Attachment Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf
e. details about how each transformer was handled or stored or otherwise	Equipment was handled by trained qualified personnel. Equipment was energized and in service from 1901 to 1975. Please note, however, that the generalized marketing of PCBs in the United States did not start until 1929.	

EPA Question	Response	Records/Information Available
processed;	Obsolete equipment was drained prior to disposal/recycling, if possible. From the time that Federal PCB regulations were enacted (1978), drained oil was incinerated or recycled, depending on its PCB content. Obsolete equipment may have been transferred to a PGE waste and used materials handling facility for interim storage prior to disposal/recycling. The obsolete equipment was incinerated, landfill disposed, or recycled based on PCB content and structural composition. Electrical equipment, including transformers, capacitors, and switches, were stored at Station L; see the response to Question 16. From sometime prior to 1966, the eastern area of Parcels E and I were used for transformer storage. By 1971, the transformer storage area had moved to the platform located at the southwest corner of the turbine building. From at least 1975 to 1986, transformers, capacitors, and switches were stored at Station L in the western area of Parcel I. Between 1986 and 2005, Parcel I was used for equipment storage. Some used, but not obsolete, PGE transformers have been sold to other companies/persons. These are documented in Supplemental Submittal S7 (documentation from facilities that may have received waste and materials from properties within the Investigation Area). For further information, see the responses to Questions 21, 27, and 40. Also see the separate 104(e) response for the Harborton Substation, which was also historically a PGE waste and used materials handling facility and the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from Station L from 1978 onward (Supplemental Submittal S7).	
f. information describing the contractual relationship Respondent had, if any, with owners or users of the respective transformers, including but not limited to, liability for disposal;	Not applicable. The equipment was owned by PGE.	
g. information on any other oil filled electrical equipment at the Property, and;	See the response to Question 47a.	
h. complete copies of any contracts, invoices, receipts, or other documents related to the transformers or other oil filled electrical equipment to the Property.	To the best of PGE's knowledge, after reasonable inquiry, contracts, agreements, or other arrangements for disposal, treatment, or recycling for Station L are provided with the waste and materials disposal, treatment, and recycling documentation attached in response to Question 21 and the documents attached in response to Question 15. Additional general PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling are provided in the Harborton Substation 104(e) response, the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from Station L (Supplemental Submittal S7), and the supplemental submittal of general PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling (Supplemental Submittal S6).	See all Question 15 Attachments Also see all Question 21 Attachments

EPA Question	Response	Records/Information Available
49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the Property.	See the response to Questions 47, 48, and 16, as well as the figures attached in response to Question 13 and Figures 2-1 through 24 in the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15, which shows Station L in 1946, 1966, 1975, and 1988. Also see the Sanborn maps (Q10_Sanborn Maps-Northern.pdf and Q10_Sanborn Maps-Southern.pdf) attached in response to Question 10. Also see the documents attached in response to Question 19, which include figures that show the location of oil-filled equipment at Station L in 1975 and 1985.	See Question 10 Attachments Q10_Sanborn Maps-Northern.pdf Q10_Sanborn Maps-Southern.pdf Also see Question 15 Attachment Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf Also see all Question 19 Attachments
Section 5.0 - Regulatory Information		
50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and/or environmental concerns.	The primary federal, state and local agencies that have or may have regulated PGE at Station L include: • City of Portland (including fire, medical, and police): building safety inspections, facility enhancements, building demolition/construction, sewer discharges, notification of spills, sampling in City of Portland streets, • Oregon Department of State Lands (DSL): Sediment removal and capping adjacent to Station L • Oregon Department of Fish and Wildlife (DFW): Sediment removal and capping adjacent to Station L • Oregon Department of Environmental Quality (DEQ): Spills, product/waste disposal, facility enhancements/demolitions, Station L remediation • Oregon Department of Energy (ODOE): regulatory oversight of the historical Station L power plant • U.S. Environmental Protection Agency (USEPA): for Portland Harbor Superfund Site, TSCA, RCRA, and Clean Water Act • U.S. Army Corps of Engineers (USACE): Sediment removal and capping adjacent to Station L, the River and Harbor Act of 1899, and Section 103 of the Marine, Protection, Research, and Sanctuaries Act • U.S. Coast Guard (USCG): spills to water • Federal Energy Regulatory Commission (FERC) (previously the Federal Power Commission, FPC): regulatory oversight of the historical Station L power plant Regarding health and safety concerns, interaction with the following agencies would have occurred as a result of a compliance inspection, a consultation visit or during the course of an accident investigation (contact with the OPUC would have occurred if an accident of a certain severity occurred at a site): • Federal Occupational Safety and Health Administration (OSHA) • Oregon Occupational Safety and Health Administration (OrOSHA) • Oregon Public Utility Commission (OPUC) • ODOT • ODOE • FERC <u>Voluntary Cleanup</u>	Question 50 Attachments Voluntary Cleanup Q50_1987-06-10_DEQ_PGE_Cleanup Plans.pdf Q50_1987-06-30 EPA-Haselberger_HC-Funderburk.pdf Q50_1987-07-07 PGE-Hess to EPA-Gearheard.pdf Q50_1987-07-21_PGE to EPA_PCB Cleanup policy.pdf Q50_1987-07-08 EPA&DEQ on PCB Cleanup Policy.pdf Q50_1987-07-13 DEQ-Hansen to PGE-Hess.pdf Q50_1987-08-11 PGE-Wihtol to EPA&DEQ_Cleanup.pdf Q50_1987-08-21 Sta L Memo_PCB Cleanup.pdf Q50_1987-08-28 PGE-Hess to DEQ-Hansen.pdf Q50_1987-07-09_PGE to EPA-Culver_Call re crayfish.pdf Q50_1987-09-15 PGE-Norton_EPA & DEQ.pdf Q50_1987-09-18 DEQ-Hansen to PGE-Hess.pdf Q50_1987-10-09 EPA-Storm to PGE-Humphrey.pdf Q50_1987-12-24 Sta L Memo_PCB Cleanup.pdf Q50_1988-02-10_PGE-Norton_DEQ-Renfro RAP.pdf Q50_1987-12-21 PGE-Hess_DEQ-Hansen.pdf Q50_1988-03-09 BES-Edmonds to PGE-Hess.pdf Q50_1988-04 Various RAP Comments.pdf Q50_1988-04-04 EPA-Malek to PGE-Norton.pdf Q50_1988-04-04 OHSU-Burton to DEQ-Renfroe.pdf Q50_1988-04-19 EPA-Malek to Humphrey.pdf Q50_1988-04-19 OMSI re Proposed RAP.pdf Q50_1988-04-20 DoSL to DEQ.pdf Q50_1988-04-20 PRC to DEQ.pdf Q50_1988-04-21 COP to DEQ_Response to RAP.pdf Q50_1988-04-21 OREC re Proposed PGE RAP.pdf Q50_1988-04-21 POP to DEQ_Response to RAP.pdf Q50_1988-04-28 DOI-FWS to DEQ_Response.pdf Q50_1988-06-13 PGE-Hess_BES-Edmonds.pdf Q50_1988-06-29 BES-Edmonds to PGE-Hess.pdf

EPA Question	Response	Records/Information Available
	The majority of the attached communications are between PGE and regulatory agencies (i.e., Oregon DEQ, USEPA, and City of Portland) or are regulatory agency memos concerning the voluntary cleanup at Station L, including clarification on the PCB cleanup policies, regulatory oversight, the review of PGE's voluntary cleanup plan, and the review of PGE's remedial action plan, activities, and reports. See the attached documents listed under "voluntary cleanup." Notable voluntary cleanup related attachments include: • April 1988 - Public and government agencies (DSL, City of Portland, Port of Portland, and US Fish and Wildlife Service) comments to the Oregon DEQ on the Station L RAP (Q50_1988-04 Various RAP Comments.pdf, Q50_1988-04-19 OMSI re Proposed RAP.pdf, Q50_1988-04-20 DoSL to DEQ.pdf, Q50_1988-04-20 PRC to DEQ.pdf, Q50_1988-04-21 COP to DEQ_Response to RAP.pdf, Q50_1988-04-21 OREC re Proposed PGE RAP.pdf, Q50_1988-04-21 POP to DEQ_Response to RAP.pdf, and Q50_1988-04-28 DOI-FWS to DEQ_Response.pdf) • August 1988 - The Oregon DEQ consent order (Q50_1988-08-03 DEQ Order of Consent.pdf) • 1988 to 1993 - PGE progress reports sent to Oregon DEQ (Q50_1988-1993 PGE Progress Reports.pdf) • February 1990 - The Oregon DEQ's Phase II ROD (Q50_1990-02-26 Phase II ROD.pdf), selecting the hybrid low-volume dredging and capping sediment remediation alternative. • April 1991 - The Oregon DEQ's Certificate of Completion for Station L Phase I and II (Q50_1991-04-17 Cert of Completion for Phase I & II.pdf) • June 1991 - Oregon DEQ's issuance of a "NFA" determination for the USTs at Station L (Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf) • November 1993 - The Oregon DEQ's Order of Completion for Station L Phase III (Q50_1993-11-16 DEQ Order of Completion.pdf). • September 1994 - The Oregon DEQ's Station L Phase III ROD (Q50_1994-09-26 Phase III ROD.pdf), in which PGE received a final "NFA" for Station L. • August 1994 – The USEPA's Site Investigation of Station L, in which they found it appropriate to refer to state authority for Station L and did not anticipate further investigation for Station L under the Federal Superfund Program; see the attached document (Q15_1994-08-09 EPA Site Investigation Report.pdf). • December 1997 - The Oregon DEQ's concurrence in the termination of the groundwater air sparging remediation system in Parcel A (Q50_1997-12-29 DEQ-	Q50_1988-07-28 DEQ-Renfroe to PGE-Norton.pdf Q50_1988-08-03 DEQ Order of Consent.pdf Q50_1988-08-10 PGE-Norton to DEQ-Renfroe.pdf Q50_1988-08-11 PGE-Norton to DEQ Renfroe.pdf Q50_1988-08-12 PGE-Norton_DEQ-Renfroe.pdf Q50_1988-08-15 PGE-Norton to DEQ-Renfro.pdf Q50_1988-08-19_DEQ Interal Memo_monitoring plan.pdf Q50_1988-09-01 DEQ-Hansen to PGE-Norton.pdf Q50_1988-10-05 DEQ-Miller to PGE-Norton.pdf Q50_1988-10-06 PGE-Norton to DEQ-Renfroe.pdf Q50_1988-10-10 PGE-Norton to DEQ-Renfroe.pdf Q50_1988-10-25 PGE-Hess to CoP Edmonds.pdf Q50_1988-10-28 PGE-Norton to DEQ-Renfroe.pdf Q50_1988-11-23 PGE-Norton to DEQ-Hatton.pdf Q50_1988-12-22 PGE-Norton to DEQ-Renfroe.pdf Q50_1988-89 Summary of Reg Submittals-Meetings.pdf Q50_1988-1993 PGE Progress Reports.pdf Q50_1989-03-10 PGE-Norton to DEQ-Renfroe.pdf Q50_1989-03-24a DEQ-Renfroe to PGE-Norton.pdf Q50_1989-03-23 DEQ-McClincy to HMS-Snyder.pdf Q50_1989-03-24b DEQ-Renfroe to PGE-Norton.pdf Q50_1989-03-30 PGE-Norton to DEQ-Renfroe.pdf Q50_1989-04-13 DEQ-Burnet to PGE-Norton.pdf Q50_1989-05-15 Sta L Meeting Notes and Slides.pdf Q50_1989-06-20 PGE-Norton to DEQ-Burnet.pdf Q50_1989-07-03 DEQ-Burnet to PGE-Norton.pdf Q50_1989-07-12 PGE-Norton to DEQ-Burnet.pdf Q50_1989-08-21 DEQ-Burnet to PGE-Norton.pdf Q50_1989-08-31 PGE-Norton to DEQ-Burnet.pdf Q50_1989-09-01 DEQ-Burnet to PGE-Norton.pdf Q50_1989-09-29 Issue with DEQ UST Terminology.pdf Q50_1989-10-26 DEQ-Burnet to PGE-Norton.pdf Q50_1990-02-26 Phase II ROD.pdf Q50_1990-03-14 CL PGE-Norton to DEQ-Burnet.pdf Q50_1990-04-02 DEQ-Burnet to PGE.pdf Q50_1990-04-11 DEQ Public Notice.pdf Q50_1990-04-16 PGE-Norton to DEQ-Burnet.pdf Q50_1990-04-17 DEQ-Burnet to PGE-Norton.pdf Q50_1990-04-18 PGE-Norton to DEQ-Burnet.pdf Q50_1990-05-14 PGE-Norton to DEQ-Burnet.pdf Q50_1990-06-22 DEQ-Miller to PGE-Stepp.pdf Q50_1990-07-27 DEQ-Miller to PGE-Norton.pdf Q50_1990-08-09 PGE-Norton to DEQ-Burnet.pdf

EPA Question	Response	Records/Information Available
	Kiernan to PGE-Norton.pdf). Please note, several of the attached voluntary cleanup-related documents (cover letters to/from PGE from/to the Oregon DEQ and/or USEPA) do not include the data, reports, or information referenced in each of the cover letters because they are already provided in other attachments or could not be located. • Q50_1987-07-07 PGE-Hess to EPA-Gearheard.pdf – See the document (Q15_1987-07-06 HC Vol PCB Cleanup Plan.pdf) attached in Question 15. • Q50_1989-07-12 PGE-Norton to DEQ-Burnet.pdf – See the document (Q15_1989-08-08 CH2MH Willamette River Sampling.pdf) attached in Question 15. • Q50_1990-03-14 CL PGE-Norton to DEQ-Burnet.pdf – See the documents (Q15_1988-1989 Lab Results.pdf and Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf) attached in Question 15. • Q50_1987-12-21 PGE-Hess_DEQ-Hansen.pdf – See the document (Q15_1987-12-17 HC Concept WP-River Sediment.pdf) attached in Question 15. • Q50_1987-09-15 PGE-Norton_EPA & DEQ.pdf – See the document (Q15_1988-05-09 SweetEdwards_GWReport.pdf) attached in Question 15 for the daily PCB cleanup and verification test data reports. To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate the groundwater monitoring program report mentioned in the attached cover letter. • To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate the data, reports, or information referenced in four of the attached cover letters (Q50_1987-06-10_DEQ_PGE_Cleanup Plans.pdf, Q50_1988-08-12 PGE-Norton_DEQ-Renfroe.pdf, Q50_1989-08-31 PGE-Norton to DEQ-Burnet.pdf, Q50_1991-02-26_PGE-Norton_DEQ-Burnet_Verif Plan.pdf, and Q50_1991-11-27_PGE-Norton_DEQ-Burnet.pdf). For further information on the voluntary cleanup at Station L, including reports and data submitted to the Oregon DEQ and the USEPA, see the response and documents attached in response to Question 15. <u>Permit Related</u> Many of the attached documents relate to permits that were applied for and/or issued during the Station L voluntary cleanup and include communications between PGE and regulatory agencies (i.e., USACE, DSL, City of Portland, and the Oregon DEQ), public notices for permit applications, and public/government comments on public notices; see the attached documents listed under "permit related." For further information on permits issued to PGE, see the response and documents attached in response to Question 52.	Q50_1990-08-31 DEQ-Burnet to PGE-Norton.pdf Q50_1991-01-16 DEQ-Burnet to PGE-Norton.pdf Q50_1991-02-26_PGE-Norton_DEQ-Burnet_Verif Plan.pdf Q50_1991-04-12 PGE-Norton to DEQ-Burnet.pdf Q50_1991-04-17 Cert of Completion for Phase I & II.pdf Q50_1991-04-30 DEQ-Hansen to PGE-Stepp.pdf Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf Q50_1991-11-27_PGE-Norton_DEQ-Burnet.pdf Q50_1992-07-13 CH2MHill-Brown to DEQ-Burnet.pdf Q50_1993-07-23 CH2MHill to DEQ.pdf Q50_1993-08-09 DEQ to CH2MHill.pdf Q50_1993-09-17_DEQ_PGE-Norton_phone call.pdf Q50_1993-11-16 DEQ Order of Completion.pdf Q50_1994-02-23 CH2M-Brown_DEQ-Burnet.pdf Q50_1994-02-23 CH2MHill-Brown to DEQ-Burnet.pdf Q50_1994-04-13 CH2MHill-Wuttig to DEQ-Burton.pdf Q50_1994-05-12 CH2MHill-Wuttig to WRD-Carter.pdf Q50_1994-06-20 CH2MHill-Wuttig to WRD-Carter.pdf Q50_1994-09-26 Phase III ROD.pdf Q50_1994-10-14 PGE-Miller to DEQ-Burnet.pdf Q50_1994-10-19 DEQ-Burnet to PGE-Norton.pdf Q50_1995-01-06 DEQ-Louis to PGE-Norton.pdf Q50_1995-08-28 PGE-Norton to DEQ-Kieran.pdf Q50_1996-06-19 DEQ-Kiernan_PGE-Norton.pdf Q50_1997-12-29 DEQ-Kiernan to PGE-Norton.pdf Q50_1998-01-16 PGE-Norton to DEQ-Kiernan.pdf Q50_1998-01-22 DEQ-Kiernan to PGE-Norton.pdf Permit Related Q50_1987-03-20 Public Notice of Permit App.pdf Q50_1987-05-05 Public Notice of Permit App.pdf Q50_1988-03-15 DSL-USACE Response to Permit App.pdf Q50_1988-03-18 PGE-Norton_Corps-Goudzwaard.pdf Q50_1988-03-21 Public Notice of Permit App.pdf Q50_1988-04-19 DSL to PGE - Required Permits.pdf Q50_1988-04-28_PGE-Norton_DSL-Bierly_Status.pdf Q50_1988-05-02 PGE to Corp-Fill Excavation(3-21).pdf Q50_1988-05-04 Various Re Public Notice.pdf Q50_1988-07-08 Public Notice of Permit App.pdf Q50_1988-07-14 USCG-Gault Re Public Notice.pdf Q50_1988-07-18 PNWA Response to Public Notice.pdf

EPA Question	Response	Records/Information Available
	Please note, that two of the attached permit-related documents are cover letters that do not include the data, reports, or information referenced in each of the cover letters because they are already provided in other attachments. The following summarizes where the information (e.g., reports and data) referenced in these cover letters are located: • Q50_1988-08-12_PGE-Norton_DSL-Bierly.pdf – See the document (Q50_1988-08-03 DEQ Order of Consent.pdf) attached in Question 50. • Q50_1990-07-19_PGE-Norton_DSL-Bierly.pdf – See the document (Q15_1990-07 CH2M_PCB River Sed Design Rept.pdf) attached in Question 15. <u>Other Documents</u> The remaining attachments include documents concerning the general regulatory agency correspondences, ODOT correspondences concerning the Marquam Bridge, the use of Station L "clean" soil as OMSI fill/surcharge, property assessment/ownership/rezoning/subdivision, UST ownership, and other various regulatory correspondences. Also attached are several correspondences between government agencies and OMSI, as well as a correspondence between ODOT and its consultant. See the documents listed under "other documents." To the best of PGE's knowledge, after reasonable inquiry, the only regulatory correspondence related specifically to health and safety is PGE's correspondence to ODOT concerning debris falling from the Marquam Bridge onto PGE property; see the attached document (Q50_1982-11-05 PGE-Rothrock to ODOT-Harwood.pdf). Please note, that one of the attached documents (Q50_1987-01-01 CL PGE-Norton to Sanderman.pdf) is a cover letter that does not include the data, reports, or information referenced because they are already provided in other attachments. For the information referenced in this cover letter, see the document (Q07_1986-12-31 OMSI_Donation and Accpt Agreement.pdf) attached in Question 7. For documents concerning violations, citations, deficiencies, and/or accidents, see the response and documents attached for Questions 51. Also see the hazardous waste notifications attached in response to Question 53.	Q50_1988-07-22 ACOE-Newgard to PGE-Norton.pdf Q50_1988-07-28 EPA Response to Public Notice.pdf Q50_1988-07-29 ODFW Response to Public Notice.pdf Q50_1988-08-15 DSL to Cor of Eng.pdf Q50_1988-08-15 ACE Permit Decision Document.pdf Q50_1988-08-12_PGE-Norton_DSL-Bierly.pdf Q50_1989-03-06_PGE to BES_UST Discharge.pdf Q50_1989-05-22_PGE to BES_UST Discharge.pdf Q50_1989-07-05 COP to PGE_Asbestos.pdf Q50_1989-07-10 Asbestos Discharge Permit Precon.pdf Q50_1989-10-05 COP to PGE_Asbestos.pdf Q50_1989-10-13 PGE to COP_Asbestos Removal.pdf Q50_1989-10-25 COP to PGE_Asbestos.pdf Q50_1990-04-11 Public Notice of Permit App.pdf Q50_1990-07-19_PGE-Norton_DSL-Bierly.pdf Q50_1990-07-19 CH2M-Gentry to DEQ-Vigil.pdf Other Documents Q50_1982-11-05 PGE-Rothrock to ODOT-Harwood.pdf Q50_1983-04-22 DEQ AQD Asbestos Rules.pdf Q50_1983-06-17 DOT to PGE Marquam ROW.pdf Q50_1983-12-27 DOT to PGE Marquam ROW.pdf Q50_1985-08-14 DOT to CWDC.pdf Q50_1986-06-09 DOT Construction Plans.pdf Q50_1987-01-01 CL PGE-Norton to Sanderman.pdf Q50_1988-02-15 SpearsLubersky-Burkholder_DOJ.pdf Q50_1988-07-21 PGE-Hess to DEQ-Hansen.pdf Q50_1988-10-19 PGE-Miska to DoA&T.pdf Q50_1988-12-15 OMSI and Request for Hearing.pdf Q50_1989-04-04 PGE-Hess_DEQ-Foster.pdf Q50_1989-08-29 DEQ-Hansen to PGE-Norton.pdf Q50_1989-10-20 DEQ Order Dismissing Case.pdf Q50_1989-12-04 Notice of Dismissal Contested Case.pdf Q50_1990-05-07 ACE to PGE-Norton.pdf Q50_1990-06-26 PGE-Norton to DEQ-Burnet_TP2.pdf Q50_1990-07-12 PP&L to DEQ.pdf Q50_1990-07-26 DEQ-Burnet to PGE-Norton.pdf Q50_1990-08-03 PGE-Brown to DEQ-Burnet.pdf Q50_1990-08-08 DEQ-Burnet to PGE-Norton.pdf Q50_1990-09-28 Legal to ODOT rePier Excavation.pdf Q50_1991-06-28 DEQ-Hansen to OMSI.pdf Q50_1991-07-16 DoT to Dan Allum.pdf Q50_1991-10-25 OMSI-Berg to DEQ-Burnet.pdf

EPA Question	Response	Records/Information Available
		Q50_1992-05-12 DRAFT_Letter to DEQ.pdf Q50_1993-07-14 PGE to DEQ re Stormwater.pdf Q50_1994-03-04 DEQ-Burnet to PGE-Norton.pdf Q50_1994-09-26 DSL Ownership Waterline Elev.pdf Q50_1995-01-17 Subdivision Hearing.pdf Q50_1995-04-26 Rezoning.pdf Q50_1995-05-02 Land Use Order.pdf Q50_1995-05-11 COP Subdivision Approval Conditions.pdf Q50_1995-07-03 COP Engineering Fees.pdf Q50_2006-03-22 DSL to PGE Easement at OMSI.pdf Also see Question 7 Attachment Q07_1986-12-31 OMSI_Donation and Accpt Agreement.pdf Also see all Question 15 Attachments Also see all Question 51 Attachments Also see all Question 52 Attachments Also see all Question 53 Attachments
51. Describe all occurrences associated with violations, citations, deficiencies. and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.	PGE maintains records of all OSHA accidents and injuries; however, the records are not categorized or searchable by property. To the best of PGE's knowledge, after reasonable inquiry, there were no OSHA reportable accidents/injuries at Station L. To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the environmental related violations/citations/deficiencies or environmental concerns issued to PGE for Station L: • In 1981, the City of Portland, Bureau of Buildings notified PGE that the City had inspected the dock, piling, and walkways adjacent to the turbine building and found them to be a public nuisance and unsafe; see the attached document (Q51_1981-03-23 COP BOB Inspection.pdf). PGE responded that due to their inaccessibility to the public and site security, PGE did not consider them to be a public nuisance or posing a danger to the public; see the attached document (Q51_1981-05-08 COP-BOB Response.pdf). Also see the attached associated documents (Q51_1981-05-21 COP-Griffith to PGE-Lilly.pdf and Q51_1981-05-26 COP to PGE_Notice to Condemn.pdf). To the best of PGE's knowledge, after reasonable inquiry, this dock was removed in approximately 1986.	Question 51 Attachments Q51_1981-03-23 COP BOB Inspection.pdf Q51_1981-05-08 COP-BOB Response.pdf Q51_1981-05-21 COP-Griffith to PGE-Lilly.pdf Q51_1981-05-26 COP to PGE_Notice to Condemn.pdf Q51_1986-04-18&30 Spill Correspondances.pdf Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf Q51_1986-10-14 EPA Inspection PCB Violations.pdf Q51_1986-11-14 EPA - TSCA Violation.pdf Q51_1986-11-19 Sta L Memo_Spill.pdf Q51_1986-12-03 Sta L Spill Procedures.pdf Q51_1987-02-02_PGE Memo on complaint.pdf Q51_1987-02-04_PGE Inspection Questions.pdf Q51_1987-02-19_PGE Inspection Notes.pdf Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf Q51_1987-09-30 EPA to PGE_TSCA Violation.pdf

EPA Question	Response	Records/Information Available
	• In October 1986, PGE was notified that USEPA found PGE in violation of four TSCA regulations concerning the disposal and storage of TSCA waste following the April 1986 Station L spills; see the attached documents (Q51_1986-10-14 EPA Inspection PCB Violations.pdf and Q51_1986-11-14 EPA - TSCA Violation.pdf). PGE responded by stating that it believed it complied with the disposal and storage provisions under TSCA and provided further clarification regarding the spills; see the attached document (Q51_1986-12-03 Sta L Spill Procedures.pdf). PGE settled all of these TSCA violations with the USEPA; see the attached documents (Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf and Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf). Also see the attached associated documents (Q51_1986-04-18&30 Spill Correspondances.pdf, Q51_1987-02-02_PGE Memo on complaint.pdf, Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf, Q51_1986-11-19 Sta L Memo_Spill.pdf, Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf, and Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf). • In September 1987, PGE was notified that USEPA found PGE in violation of TSCA regulations concerning PCB recordkeeping, use authorizations, marking, storage, and disposal at multiple PGE locations, including Station L and the Hawthorne Building; see the attached document (Q51_1987-09-30 EPA to PGE_TSCA Violation.pdf). PGE settled all TSCA violations with the USEPA; see the attached documents (Q51_1988-03-28_EPA to PGE_Consent Agrmnt.pdf). Also see the attached associated documents (Q51_1987-02-04_PGE Inspection Questions.pdf, Q51_1987-02-19_PGE Inspection Notes.pdf, Q51_1987-10-29_PGE to EPA_Clarification Letter.pdf, Q51_1987-11-16_PGE_EPA Meeting Summary.pdf, Q51_1987-12-28_PGE to EPA_Info Request.pdf, and Q51_1987-1988 PGE to EPA_Phone Memos.pdf). • In 1989, During the removal of the remaining ACM from Station L, a total of approximately 62,750 gallons of treated (filtered) ACM-contaminated waste water, generated from the washing of equipment and building interiors and daily decontamination showers for personnel, was discharged to the municipal sanitary sewer under a City of Portland special discharge permit. During the discharges, asbestos-containing water was inadvertently discharged to the sewer due to an apparent failure in the filtration system; see the attached documents (Q51_1989-09-28 Permit Compliance Order.pdf, Q51_1989-10-25 Permit Compliance Follow Up.pdf, and Q51_1990-02-05_PGE to COP-Asbestos concerns.pdf). Also see the documents (Q21c_1989-03-23 PAS Memo.pdf, Q21c_1989-04-04 PAS Memo.pdf, Q21c_1989-06-13 HMS Memo.pdf, Q21c_1989-10-02 HMS Memo.pdf, and Q21c_1989-10-04 Water Disposal Work Plan.pdf) attached in response to Question 21, the documents (Q50_1989-07-05 COP to PGE_Asbestos.pdf, Q50_1989-07-10 Asbestos Discharge Permit Precon.pdf, Q50_1989-10-05 COP to PGE_Asbestos.pdf, Q50_1989-10-13 PGE to COP_Asbestos Removal.pdf, and Q50_1989-10-25 COP to PGE_Asbestos.pdf) attached in response to Question 50, and the documents (Q52_1989-06-14 Special Permit Request.pdf, Q52_1989-06-30 Wastewater Discharge Permit.pdf, Q52_1989-	Q51_1987-10-29_PGE to EPA_Clarification Letter.pdf Q51_1987-11-16_PGE_EPA Meeting Summary.pdf Q51_1987-12-28_PGE to EPA_Info Request.pdf Q51_1987-1988 PGE to EPA_Phone Memos.pdf Q51_1988-03-28_EPA to PGE_Consent Agrmnt.pdf Q51_1989-09-28 Permit Compliance Order.pdf Q51_1989-10-25 Permit Compliance Follow Up.pdf Q51_1990-02-05_PGE to COP-Asbestos concerns.pdf Also see Question 21 Attachment Q21c_1989-03-23 PAS Memo.pdf Q21c_1989-04-04 PAS Memo.pdf Q21c_1989-06-13 HMS Memo.pdf Q21c_1989-10-02 HMS Memo.pdf Q21c_1989-10-04 Water Disposal Work Plan.pdf Also see Question 50 Attachments Q50_1989-07-05 COP to PGE_Asbestos.pdf Q50_1989-07-10 Asbestos Discharge Permit Precon.pdf Q50_1989-10-05 COP to PGE_Asbestos.pdf Q50_1989-10-13 PGE to COP_Asbestos Removal.pdf Q50_1989-10-25 COP to PGE_Asbestos.pdf Also see Question 52 Attachments Q52_1989-06-14 Special Permit Request.pdf Q52_1989-06-30 Wastewater Discharge Permit.pdf Q52_1989-09-22 Permit Modification.pdf Q52_1989-09-25 Permit Modification.pdf Q52_1989-10-05 Asbestos Permit Modification.pdf

EPA Question	Response	Records/Information Available
	09-22 Permit Modification.pdf, Q52_1989-09-25 Permit Modification.pdf, and Q52_1989-10-05 Asbestos Permit Modification.pdf) attached in response to Question 52. For spills/discharges, please see the response to Question 62.	
52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits. NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.	To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the environmental permits PGE was issued for Station L: • On 6 March 1957, the City of Portland issued PGE a permit to extend five test borings in the street area between SE Caruthers St and SE Sherman St, west of SE Fourth Ave; see the attached document (Q52_1957-03-06 CoP Permit.pdf). To the best of PGE's knowledge, after reasonable inquiry, the testing occurred right before the area was conveyed to PGE by the City of Portland on 17 March 1957; see the plat (Q04_Plats.pdf) attached in response to Question 4. To the best of PGE's knowledge, after reasonable inquiry, PGE does not have test boring lots or analytical results from testing. • In 1988, PGE obtained permits for the eight USTs in Parcel A; see the attached document (Q52_1988-06-17_PGE to DEQ_UST Permit fee.pdf). After emptying the tanks, the tanks and their permits were conveyed to OMSI in June/July 1988; see the attached PGE memos (Q52_1987-1988_PGE Memos re Garage USTs.pdf) and the document (Q50_1988-07-21 PGE-Hess to DEQ-Hansen.pdf) attached in response to Question 50. Also see the attached PGE memos (Q52_1989-01-20_PGE to DEQ_UST Phone Memo.pdf and Q52_1989-09-18_PGE Memo on UST Decom.pdf), which explain why PGE was not required to report/permit the USTs in Parcel C. • In 1988 and 1990, PGE obtained a joint permit from the DSL and the USACE for the removal of PCB-contaminated sediments and the placement of clean fill (the sediment cap) in the Willamette River at Milepost 13.5; see the attached documents (Q52_1988-03-11 Permit App.pdf, Q52_1988-06-21 Permit App Modification.pdf, Q52_1988-08-12 DSL Permit.pdf, Q52_1988-08-18 USACE Permit.pdf, and Q52_1990-07-25 Permit Modification.pdf) and Appendix A of the Final Phase II Report (Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf) attached in response to Question 15. The placement of the fill (capping) of the sediment was part of the Phase II remediation at Station L. For further details, see the response and document (Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf) attached for Question 15, as well as the response to Question 21. • In 1989, PGE obtained a special discharge permit from the City of Portland for the disposal of filtered ACM-contaminated waste water into the municipal sanitary sewer lines; see the attached documents (Q52_1989-06-14 Special Permit Request.pdf, Q52_1989-06-30 Wastewater Discharge Permit.pdf, Q52_1989-09-22 Permit	Question 52 Attachments Q52_1957-03-06 CoP Permit.pdf Q52_1987-1988_PGE Memos re Garage USTs.pdf Q52_1988-03-11 Permit App.pdf Q52_1988-06-17_PGE to DEQ_UST Permit fee.pdf Q52_1988-06-21 Permit App Modification.pdf Q52_1988-08-12 DSL Permit.pdf Q52_1988-08-18 USACE Permit.pdf Q52_1989-01-20_PGE to DEQ_UST Phone Memo.pdf Q52_1989-06-30 OMSI Permit App.pdf Q52_1990-07-25 Permit Modification.pdf Q52_1989-06-14 Special Permit Request.pdf Q52_1989-06-30 Wastewater Discharge Permit.pdf Q52_1989-09-18_PGE Memo on UST Decom.pdf Q52_1989-09-22 Permit Modification.pdf Q52_1989-09-25 Permit Modification.pdf Q52_1989-10-05 Asbestos Permit Modification.pdf Q52_1990-03-20 OMSI Permit Request.pdf Q52_1990-05-10 Modification Request.pdf Q52_1995 DSL-USACE Dock Removal.pdf Also see Question 4 Attachment Q04_Plats.pdf Also see Question 15 Attachment Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf Q15_1989-01-09 Tech Spec for Asbestos Abatement.pdf Also see Question 21 Attachments Q21c_1989-03-23 PAS Memo.pdf Q21c_1989-04-04 PAS Memo.pdf Q21c_1989-06-13 HMS Memo.pdf Q21c_1989-10-02 HMS Memo.pdf Q21c_1989-10-04 Water Disposal Work Plan.pdf Also see Question 50 Attachments

EPA Question	Response	Records/Information Available
	Modification.pdf, Q52_1989-09-25 Permit Modification.pdf, and Q52_1989-10-05 Asbestos Permit Modification.pdf). The ACM-contaminated wastewater was generated from washing equipment, building interiors, and personnel during the removal of asbestos from Station L. During the discharges, asbestos-containing water was inadvertently discharged to the sewer due to an apparent failure in the filtration system. For further details, see the response to Question 13g and the document (Q15_1989-01-09 Tech Spec for Asbestos Abatement.pdf) attached for Question 15, as well as the response and documents (Q21c_1989-03-23 PAS Memo.pdf, Q21c_1989-04-04 PAS Memo.pdf, Q21c_1989-06-13 HMS Memo.pdf, Q21c_1989-10-02 HMS Memo.pdf, and Q21c_1989-10-04 Water Disposal Work Plan.pdf) attached for Question 21. Also see the documents (Q50_1989-07-05 COP to PGE_Asbestos.pdf, Q50_1989-07-10 Asbestos Discharge Permit Precon.pdf, Q50_1989-10-05 COP to PGE_Asbestos.pdf, Q50_1989-10-13 PGE to COP_Asbestos Removal.pdf, and Q50_1989-10-25 COP to PGE_Asbestos.pdf) attached in response to Question 50 and the documents (Q51_1989-09-28 Permit Compliance Order.pdf, Q51_1989-10-25 Permit Compliance Follow Up.pdf, and Q51_1990-02-05_PGE to COP-Asbestos concerns.pdf) attached in response to Question 51. • In March 1990, OMSI was granted permission to discharge water (rainwater) into the Willamette River from two open USTs, which had been emptied and cleaned by PGE prior to OMSI taking possession. Prior to the discharge of the water from these two OMSI USTs and due to OMSI demolition activities, water from these tanks entered into a third UST that PGE was in the process of cleaning. Because the water was sourced from the two OMSI USTs, PGE sent a letter to the Oregon DEQ, Water Quality Section in May 1990 requesting permission to discharge the water from PGE's UST to the Willamette River under the OMSI Special Permit. See the attached documents (Q52_1990-05-10 Modification Request.pdf and Q52_1990-03-20 OMSI Permit Request.pdf). To the best of PGE's knowledge, after reasonable inquiry, PGE was granted permission. • On 23 July 1990, PGE was granted a two-month special NPDES permit for the discharge of treated supernatant from the Station L sediment dredging remedial operations into the Willamette River; see Appendix B of the Final Phase II Report (Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf) attached in response to Question 15. Also see the response to Question 13g. • In 1995, PGE sent a joint permit application to the DSL and the USACE for a permit to remove the dock adjacent to Parcel I. PGE was granted the permit by USACE and was told by the DSL that they were authorized to remove the dock, but that no further permit was required as the work could be done under the on file permit RF9213. See the attached document (Q52_1995 DSL-USACE Dock Removal.pdf), which includes the permit application, USACE permit, and DSL letter. To the best of PGE's knowledge, after reasonable inquiry, PGE does not have a copy of DSL permit RF9213, which authorized PGE to remove unused and abandoned structures along	Q50_1988-07-21 PGE-Hess to DEQ-Hansen.pdf Q50_1989-07-05 COP to PGE_Asbestos.pdf Q50_1989-07-10 Asbestos Discharge Permit Precon.pdf Q50_1989-10-05 COP to PGE_Asbestos.pdf Q50_1989-10-13 PGE to COP_Asbestos Removal.pdf Q50_1989-10-25 COP to PGE_Asbestos.pdf Also see Question 51 Attachments Q51_1989-09-28 Permit Compliance Order.pdf Q51_1989-10-25 Permit Compliance Follow Up.pdf Q51_1990-02-05_PGE to COP-Asbestos concerns.pdf

EPA Question	Response	Records/Information Available
	Station L. Also attached is an environmental permit application that OMSI sent to the USACE in 1989 for the construction of a rock revetment bank and elevated public walkway along the portion of Station L that OMSI purchased from PGE in 1986; see the attached document (Q52_1989-06-30 OMSI Permit App.pdf). PGE also obtained non-environmental waste permits for Station L during the remedial activities. For further details on waste and used materials handling, including waste permits, see the responses to Question 21, as well as Questions 53 through 59.	
53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.	Yes. To the best of PGE's knowledge, after reasonable inquiry, the following summarizes PGE's hazardous waste activity notifications under RCRA: • In 1987, PGE obtained a USEPA HWG ID number (ORD981764376) for the EM&C Department at Station L, including the Central Division Garage (Market St Garage); see the attached documents (Q53_1987-03-16 Application for USEPA HW ID.pdf and Q53_1987-05-11 EPA ID#.pdf). • Between April 1987 and May 1988, PGE removed and disposed of (recycled) liquid RCRA waste/materials and liquid non-regulated waste/materials from Station L. To the best of PGE's knowledge, after reasonable inquiry, these materials were from the Central Division Garage, prior to its relocation to outside of the Investigation Area.; see the response and the document (Q21c_1987-1988 RCRA HW Manifests.pdf) attached for Question 21c • In June 1988, PGE sent a request to decommission or delete the Station L USEPA HWG ID number (ORD981764376) because the Central Division Garage had moved locations and that the property was no longer expected to generate RCRA hazardous waste; see the attached document (Q53_1988-06-02 Decommission EPA ID#.pdf). • In 1988, PGE requested that the Station L USEPA HWG ID number (ORD981764376) be reinstated for Station L for the disposal of PCB waste; see the attached document (Q53_1988-08-11 Reactivation EPA ID#.pdf). PGE then filed a USEPA Notification of Hazardous Waste Activity form in 1988; see the attached document (Q53_1988-10-06 Notification of HW Activity.pdf). Please note, however, that PCBs fall under TSCA regulations, not RCRA. • In 1989, under the Station L USEPA HWG ID number (ORD 981764376), PGE removed liquid RCRA waste (ignitable waste, halogenated solvents, non-halogenated solvents, and/or lead and cadmium waste) along with non-regulated cleaning solution (phosphates, soap, and water) from Station L; see the response and the document (Q21c_1989 RCRA HW Manifests.pdf) attached for Question 21c.	Question 53 Attachments Q53_1987-03-16 Application for USEPA HW ID.pdf Q53_1987-05-11 EPA ID#.pdf Q53_1988-06-02 Decommission EPA ID#.pdf Q53_1988-08-11 Reactivation EPA ID#.pdf Q53_1991-11-21 Notification of HW Activity.pdf Q53_1988-10-06 Notification of HW Activity.pdf Q53_1992-11-24 EPA ID# withdrawl.pdf Q53_1994-04-14 Haz Waste Notification.pdf Q53_1994 Notification of HW Activity.pdf Q53_1994 PGE_DEQ_Annual HW Report.pdf Q53_1995-2002 HW Registration Verification Repts.pdf Q53_2003-12-24 DEQ to PGE-Bidwell.pdf Q53_2003 RCRA Site ID Form.pdf Also see Question 21 Attachments Q21c_1987-1988 RCRA HW Manifests.pdf Q21c_1989 RCRA HW Manifests.pdf Q21c_1994 RCRA HW Manifests.pdf Q21c_1993-12-13 RCRA Waste Profile.pdf

EPA Question	Response	Records/Information Available
	• PGE filed a USEPA Notification of Hazardous Waste Activity form in 1991; see the attached document (Q53_1991-11-21 Notification of HW Activity.pdf). • Because PGE did not anticipate further RCRA waste and it was clarified that PCB waste was regulated under TSCA, the Station L USEPA HWG ID number (ORD981764376) was withdrawn in 1992 (with a facility effective date of November 2000); see the attached document (Q53_1992-11-24 EPA ID# withdrawl.pdf). • In 1994, PGE obtained a new Station L USEPA HWG ID number (ORD987185204), with the address corresponding to Parcel I (which PGE continued to own until 2005), and a status of small quantity generator; see the attached documents (Q53_1994-04-14 Haz Waste Notification.pdf and Q53_1994 Notification of HW Activity.pdf). • In 1994, PGE disposed of approximately 1,525 gallons of RCRA monitoring well purge water (ignitable waste) and non-regulated decontamination water; see the attached document (Q53_1994 PGE_DEQ_Annual HW Report.pdf) and the response and documents (Q21c_1994 RCRA HW Manifests.pdf and Q21c_1993-12-13 RCRA Waste Profile.pdf) attached in response to Question 21c. • From 1995 to 2003, PGE filed RCRA Waste Verification Reports as a conditionally exempt generator (CEG); see the attached documents (Q53_1995-2002 HW Registration Verification Repts.pdf, Q53_2003 RCRA Site ID Form.pdf, and Q53_2003-12-24 DEQ to PGE-Bidwell.pdf). Hazardous wastes and/or materials from Station L may have also been disposed of after interim storage at a PGE waste and used materials handling facility (e.g., PSC, Sellwood Substation, Harborton Substation, and Wilsonville). See the 104(e) response for Harborton Substation, which is within the Investigation Area and was historically a PGE waste and used materials handling facility, as well as the supplemental submittal of documentation from other facilities that may have received waste and used materials from Station L Substation (Supplemental Submittal S7).	
54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.	Not applicable. There was no application for "interim status".	

EPA Question	Response	Records/Information Available
55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.	EPA HWG, ID Numbers ORD981764376 and ORD987185204.	
56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.	Between 1986 and 1998, PGE disposed of TSCA waste (PCB-containing and ACM) and RCRA waste (solvents, ignitable waste, lead, and cadmium) from Station L; see the response and documents attached for Question 21. This waste was generated during the Station L site remediation, during which both the Oregon DEQ and the USEPA were provided information on the site remedial activities, including generated waste. Also see the responses and documents for Questions 15, 51, and 53. Hazardous wastes and/or materials from Station L may have also historically been disposed of after interim storage at a PGE waste and used materials handling facility (e.g., PSC). See the 104(e) response for Harborton Substation, which is within the Investigation Area and was historically a PGE waste and used materials handling facility, and the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from Stephens Substation (Supplemental Submittal S7).	See all Question 15 Attachments Also see all Question 21 Attachments Also see all Question 51 Attachments Also see all Question 53 Attachments
57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.	Between 1986 and 1998, PGE disposed of TSCA waste (PCB-containing and ACM) and RCRA waste (solvents, ignitable waste, lead, and cadmium) from Station L; see the response and documents attached for Question 21. This waste was generated during the Station L site remediation, during which both the Oregon DEQ and the USEPA were provided information on the site remedial activities, including generated waste. Also see the responses and documents for Questions 15, 51, and 53. Hazardous wastes and/or materials from Station L may have also historically been disposed of after interim storage at a PGE waste and used materials handling facility (e.g., PSC). See the 104(e) response for Harborton Substation, which is within the Investigation Area and was historically a PGE waste and used materials handling facility, and the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from Stephens Substation (Supplemental Submittal S7).	See all Question 15 Attachments Also see all Question 21 Attachments Also see all Question 51 Attachments Also see all Question 53 Attachments
58. List all federal and state environmental laws and regulations under which the Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C.	The federal and state environmental laws and regulations under which Respondent has reported include TSCA; RCRA; Clean Water Act; Oregon Hazardous Substance Remedial Action Law; Oregon Hazardous Waste and Hazardous Materials Law; the Oregon Solid Waste Law; and the state fire code; as well as the River and Harbor Act of 1899; Section 103 of the Marine, Protection, Research, and Sanctuaries Act; and ORS 541.605 to 541.695 pertaining to the remediation (removal) of the sediment and placement of the sediment cap. See the responses and documents attached for Questions 15, 21, 50, 51, 52, 53, and 62.	See all Question 15 Attachments Also see all Question 21 Attachments Also see all Question 50 Attachments Also see all Question 52 Attachments Also see all Question 53 Attachments

EPA Question	Response	Records/Information Available
Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.		Also see all Question 62 Attachments
59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.	Annual PCB reports (1978-2008) for PGE (all PGE sites combined) are maintained in compliance with record-reporting rule 40 CFR 761 and are provided in a supplemental submittal (Supplemental Submittal S3).	
60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a repot to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide	Not applicable. To the best of PGE's knowledge, after reasonable inquiry, PGE did/does not have an aquatic lands lease or easement for the submersible land, including the sediment cap, adjacent to Station L. To the best of PGE's knowledge, after reasonable inquiry, correspondence between PGE and DSL regarding Station L has been limited to the determination of property ownership, permits for in-water work (sediment excavation, placement of sediment cap, and removal of structures), and a request from DSL in 2006 for PGE to obtain an easement for the sediment cap; see the documents (Q07_1990-08-15 DSL QuitClaim Deeds.pdf and Q07_1990-05-01 DSL Ownership Investigation.pdf) attached in response to Question 7, the documents (Q50_1988-03-15 DSL-USACE Response to Permit App.pdf, Q50_1988-04-19 DSL to PGE - Required Permits.pdf, Q50_1988-04-28_PGE-Norton_DSL-Bierly_Status.pdf, Q50_1988-08-12_PGE-Norton_DSL-	See Question 7 Attachments Q07_1990-08-15 DSL QuitClaim Deeds.pdf Q07_1990-05-01 DSL Ownership Investigation.pdf Also see Question 15 Attachment Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf Also see Question 50 Attachments Q50_1988-03-15 DSL-USACE Response to Permit App.pdf Q50_1988-04-19 DSL to PGE - Required Permits.pdf Q50_1988-04-28_PGE-Norton_DSL-Bierly_Status.pdf

EPA Question	Response	Records/Information Available
copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other stale agency.	Bierly.pdf, Q50_1990-07-19_PGE-Norton_DSL-Bierly.pdf, Q50_1994-09-26 DSL Ownership Waterline Elev.pdf, and Q50_2006-03-22 DSL to PGE Easement at OMSI.pdf) attached in response to Question 50, and to documents (Q52_1988-03-11 Permit App.pdf, Q52_1988-06-21 Permit App Modification.pdf, Q52_1988-08-12 DSL Permit.pdf, Q52_1988-08-18 USACE Permit.pdf, Q52_1990-07-25 Permit Modification.pdf, and Q52_1995 DSL-USACE Dock Removal.pdf) attached in response to Question 52. Also see the document (Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf) attached in response to Question 15, specifically Appendix A.	Q50_1988-08-12_PGE-Norton_DSL-Bierly.pdf Q50_1990-07-19_PGE-Norton_DSL-Bierly.pdf Q50_1994-09-26 DSL Ownership Waterline Elev.pdf Q50_2006-03-22 DSL to PGE Easement at OMSI.pdf Also see Question 52 Attachments Q52_1988-03-11 Permit App.pdf Q52_1988-06-21 Permit App Modification.pdf Q52_1988-08-12 DSL Permit.pdf Q52_1988-08-18 USACE Permit.pdf Q52_1990-07-25 Permit Modification.pdf Q52_1995 DSL-USACE Dock Removal.pdf
61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.	To the best of PGE's knowledge, after reasonable inquiry, none. To the best of PGE's knowledge, after reasonable inquiry, PGE did not/does not have an aquatic lands lease or easement for the submersible land, including the sediment cap, adjacent to Station L. See the response to Question 60.	
Section 6.0 - Releases and Remediation		
62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify and provide copies of any documents regarding: a. when such releases occurred;	To the best of PGE's knowledge, after reasonable inquiry, the attached documents provide information describing the known leaks, spills, or releases into the environment at Station L. The following summary incorporates all such information with respect to specific releases and spills that have occurred at Station L: • 3 April 1971 - To the best of PGE's knowledge, after reasonable inquiry, approximately 2 gallons of PCB-containing oil (askarel oil >500 ppm) were released onto the transformer storage area platform, located at the southwest corner of the turbine building, and to the soil and vegetation beside the platform (Willamette shoreline) when a stored transformer (KX17) failed. PGE personnel cleaned up the spill on the platform using a solvent (1500) to remove the oil. Winter river flooding and rains apparently released the PCB-contaminated soil beside the platform to the	Question 62 Attachments Q62_1980_Non-PGE Sourced Spills.pdf Q62_1986-04-18 Spill Report.pdf Q62_1986-04-30 Spill Report.pdf Q62_1987-06-15 Memo on Historical PCB.pdf Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf Q62_1987-06-24_PGE Phone Memo_1971 spill.pdf Q62_1986-09-18_1701 SE Water.pdf Q62_1986-11-06 Oil Spill Report.pdf Q62_1987-01-28 Oil Spill Questionaire.pdf Q62_1987-03-16 Oil Spill Questionaire.pdf Q62_1988-06-07 Oil Spill Questionaire.pdf

EPA Question	Response	Records/Information Available
b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks. drums, barrels, or recovery units). and treated); c. the amount of each hazardous substances, pollutants, or contaminants so released; d. where such releases occurred; e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release; f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken; g. all persons with information relating to these releases; and h. list all local, state, or federal departments or agencies notified of the release, if applicable;	river. See the attached PGE memorandums related to this 1971 spill (Q62_1987-06-15 Memo on Historical PCB.pdf, Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf, Q62_1987-06-24_PGE Phone Memo_1971 spill.pdf). This release to the Willamette River, as well as several upland (soil) PCB-containing oil releases, were discovered in 1986 during site investigations of Station L conducted by PGE to fulfill the OMSI donation contingency (Parcels A-F were donated to OMSI in December 1986 with the contingency that PGE would cleanup all soils contaminated with PCBs and other materials). The releases were reported to the Oregon DEQ and the USEPA. PGE entered into the Oregon DEQ's Voluntary Cleanup Program in 1987. In August 1988, PGE entered into a three-phase consent order (DEQ No. ECSR-NWR-88-02) to identify the nature and extent of hazardous substances over the entire Station L property (Parcels A through I) and Stephens Substation (addressed in a separate 104(e) response); see the document (Q50_1988-08-03 DEQ Order of Consent.pdf) attached in response to Question 50. Under Phase I and Phase II consent order requirements, PGE completed the remediation of PCB-contaminated river sediments in 1990 (removal of sediments to 1 ppm and capping of the remaining sediment). In April 1991, the Oregon DEQ issued a certificate of completion indicating that PGE had met the Phase I and Phase II consent order requirements; see the document (Q50_1991-04-17 Cert of Completion for Phase I & II.pdf) attached in response to Question 50. Additional upland soil releases were discovered during the Phase III site investigations, including a release from a leaking UST; see the attached document (Q62_1989-12-12 DEQ LUST Info.pdf). Upland soil at Station L was remediated for PCBs (to 1 ppm), PAHs, TPH, VOCs, and metals. Under Phase III consent order requirements, PGE completed the remediation of the uplands portion of Station L in 1994. See response and documents (Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf, Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf, and Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached for Question 15. In June 1991, PGE received a "NFA" determination for the USTs at Station L; see the document (Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf) attached in response to Question 50. In November 1993, the Oregon DEQ issued an Order of Completion for Station L Phase III; see the document (Q50_1993-11-16 DEQ Order of Completion.pdf) attached in response to Question 50. In September 1994, PGE received a final "NFA" for Station L in Oregon DEQ's Station L Phase III ROD; see the document (Q50_1994-09-26 Phase III ROD.pdf) attached in response to Question 50. The USEPA completed a Site Investigation of Station L in August 1994; see the document (Q15_1994-08-09 EPA Site Investigation Report.pdf) attached in response to Question 15. Based on their site investigation and other pertinent information, the USEPA found it appropriate to refer to state authority for Station L and did not anticipate further investigation for Station L under the Federal Superfund Program.	Q62_1989-02-07 Oil Spill Questionaire.pdf Q62_1993-09-13 Oil Spill Report.pdf Q62_1993-11-03 Oil Spill Questionaire.pdf Q62_1989-12-12 DEQ LUST Info.pdf Also see Question 15 Attachments Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf Q15_1994-08-09 EPA Site Investigation Report.pdf Also see Question 21 Attachments Q21a_1986-11-07 Eq list & PCB results.pdf Q21c_1979-04-03 Invoice.pdf Q21c_1984-03-07 PCB Disposal.pdf Q21c_1986-04-22 PCB trans report.pdf Q21c_1986-07-29 PCB trans report.pdf Q21c_1986-10-16 PCB trans report.pdf Q21c_1986-11-06 Spill Disposal.pdf Q21c_1987-03-30 PCB trans report.pdf Also see Question 50 Attachments Q50_1988-08-03 DEQ Order of Consent.pdf Q50_1991-04-17 Cert of Completion for Phase I & II.pdf Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf Q50_1993-11-16 DEQ Order of Completion.pdf Q50_1994-09-26 Phase III ROD.pdf Also see Question 51 Attachments Q51_1986-04-18&30 Spill Correspondances.pdf Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf Q51_1986-10-14 EPA Inspection PCB Violations.pdf Q51_1986-11-14 EPA - TSCA Violation.pdf Q51_1986-11-19 Sta L Memo_Spill.pdf Q51_1986-12-03 Sta L Spill Procedures.pdf Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf

EPA Question	Response	Records/Information Available
	• 10 April 1980 and 9 June 1980 – Two non-PGE sourced discharges occurred from the storm drain that runs through Station L into the Willamette River; see the attached document (Q62_1980_Non-PGE Sourced Spills.pdf). PGE reported these non-PGE discharges to the Oregon DEQ. • 18 April 1986 – Approximately 5-25 gallons of PCB-containing oil (91-107 ppm) from an oil tank spilled onto gravel in the Station L tank farm; see the attached document (Q62_1986-04-18 Spill Report.pdf). The spill occurred during the transfer of insulating oil into a holding tank. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD 86-203), contained, and cleaned up (including the removal and disposal of the PCB-containing gravel and soil. The PCB and petroleum hydrocarbon-containing soil/gravel was disposed of at the Arlington Landfill after interim storage at PSC, a PGE waste and used materials handling facility; see the document (Q21c_1986-04-22 PCB trans report.pdf) attached in response to Question 21c. Also see the response and documents (Q51_1986-04-18&30 Spill Correspondances.pdf, Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf, Q51_1986-10-14 EPA Inspection PCB Violations.pdf, Q51_1986-11-14 EPA - TSCA Violation.pdf, Q51_1986-11-19 Sta L Memo_Spill.pdf, Q51_1986-12-03 Sta L Spill Procedures.pdf, Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf, Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf, Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf, and Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf) attached for Question 51. • 30 April 1986 – Approximately 1 gallon of PCB-containing oil (66 ppm) from an oil tank spilled onto gravel in the Station L tank farm; see the attached document (Q62_1986-04-30 Spill Report.pdf). The spill occurred during the PCB-containing oil decontamination activities by Sun Ohio Corporation. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD 86-178), contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the PCB and petroleum hydrocarbon-containing soil/gravel was likely disposed of at Arlington Landfill after interim storage at a PGE waste and used materials handling facility. Also see the response and documents (Q51_1986-04-18&30 Spill Correspondances.pdf, Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf, Q51_1986-10-14 EPA Inspection PCB Violations.pdf, Q51_1986-11-14 EPA - TSCA Violation.pdf, Q51_1986-11-19 Sta L Memo_Spill.pdf, Q51_1986-12-03 Sta L Spill Procedures.pdf, Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf, Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf, Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf, and Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf) attached for Question 51. • 18 September 1986 – Approximately 60 gallons of PCB-containing (0.4 ppm) oil were released into the gravel and soil at PGE's Market Street Garage when a UST underground oil pipe ruptured; see the attached document (Q62_1986-09-18_1701 SE Water.pdf). The released oil drained into two dry wells in the garage parking lot. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD	

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	86-483), contained, and cleaned up (including the PCB-containing absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB and petroleum hydrocarbon-containing absorbent was likely disposed of at the Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 6 November 1986 – Approximately 2 gallons of PCB-containing oil (approximately 300 ppm) from Oil Storage Tank #6 were spilled onto the gravel in the Station L tank farm; see the attached document (Q62_1986-11-06 Oil Spill Report.pdf). The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). The PCB and petroleum hydrocarbon-containing soil/gravel was disposed of at the Arlington Landfill after interim storage at Sellwood Substation, a PGE waste and used materials handling facility; see the document (Q21c_1986-11-06 Spill Disposal.pdf) attached in response to Question 21. • 28 January 1987 – Approximately 10-15 gallons of PCB-containing oil (77 ppm) were released onto the gravel and migrated to surface water within the Station L tank farm; see the attached document (Q62_1987-01-28 Oil Spill Questionaire.pdf). The spill occurred when a tanker truck leaked while transferring oil to containers within the tank farm. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel, soil, and absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB- and petroleum hydrocarbon-containing soil/gravel/absorbent was likely disposed of at Arlington Landfill after interim storage at a PGE waste and used materials handling facility. Confirmation sampling was conducted to ensure cleanup; the confirmation composite soil sample had a PCB concentration of 0.32 ppm. • 16 March 1987 – Approximately 5 gallons of PCB-containing oil (20 ppm) spilled onto gravel in the Station L tank farm; see the attached document (Q62_1987-03-16 Oil Spill Questionaire.pdf). The spill occurred when the oil shifted in a tanker and spilled out of the top lid during filling activities. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the petroleum hydrocarbon-containing soil/gravel was likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. Confirmation soil sampling results were all less than 1 ppm PCB. • 23 April 1987 – Approximately 45 gallons of PCB-containing oil (1 ppm) were released from a pole-mounted transformer onto the gravel in the Station L storage yard when a truck struck the pole. To the best of PGE's knowledge, after reasonable inquiry, the petroleum hydrocarbon-containing soil/gravel was likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used	

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	materials handling facility. • 7 June 1988 – Approximately 0.03 gallons of PCB-containing insulating oil (35 ppm) and water from an emptied 5 kVA transformer was released onto the asphalt at Station L; see the attached document (Q62_1988-06-07 Oil Spill Questionaire.pdf). The spill was caused when thieves tipped over a training transformer (empty with some water inside). The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB- and petroleum hydrocarbon-containing absorbent was likely disposed of at Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 2 February 1989 – Approximately 2 gallons of oil and water were released onto PGE's asphalt parking area when five barrels of oil and water froze and burst; see the attached document (Q62_1989-02-07 Oil Spill Questionaire.pdf). The lab results of the oil/water were non-detect for PCBs. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of the absorbent). To the best of PGE's knowledge, after reasonable inquiry, the 14 drums of petroleum hydrocarbon-contaminated absorbent were likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 13 September 1993 – Approximately 1 gallon of PCB-containing oil (9 ppm) from a concrete fuel tank spilled onto gravel; see the attached document (Q62_1993-09-13 Oil Spill Report.pdf). The spill occurred while EMCON (a PGE contractor) was sampling the tank, which was believed to have been empty. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the approximately 8 cubic feet of petroleum hydrocarbon-containing soil/gravel were likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 3 November 1993 – Approximately 50-70 gallons of diesel fuel were released from the tank farm pipeline onto gravel within the Station L tank farm; see the attached document (Q62_1993-11-03 Oil Spill Questionaire.pdf). The spill occurred while O'Sullivan (a PGE contractor) was disassembling piping from the pump house to the tank farm. The spill was reported to the PGE System Control Center and the Oregon DEQ, contained, and cleaned up (including the removal and disposal of gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the approximately 150 square feet of petroleum hydrocarbon-containing soil/gravel were likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility.	

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	PGE had oil-filled equipment on various portions of the Station L property including Station L Power Plant equipment (early 1900s to 1975), Lincoln Substation equipment (early 1900s to 1975/1986), and stored electrical equipment (from sometime prior to 1966 to 1986/2005). The attached document (Q21a_1986-11-07 Eq list & PCB results.pdf) lists the oil-filled substation equipment at Station L (likely Lincoln Substation) in 1986. The transformer capacity records provided in a supplemental submittal (Supplemental Submittal S8) list the power generating equipment at Station L from 1936 to 1978, some of which may have been located in Stephens Substation since it was originally considered part of Station L. Other oil-filled equipment transportation, disposal, or cleaning documents include: • In 1979, a capacitor from Station L (may have actually been from Stephens Substation) and multiple capacitors from several PGE locations outside of the Investigation Area (e.g., Sellwood, Progress, and Urban Substations) were stored at the EM&C storage yard within Station L prior to disposal at Arlington Landfill; see the document (Q21c_1979-04-03 Invoice.pdf) attached in response to Question 21c. • In 1984, to the best of PGE's knowledge, after reasonable inquiry, approximately 6,000 gallons of PCB-containing oil, drained from electrical equipment and/or USTs and stored in mobile storage skid in the east side yard at Station L, were disposed at the Union Electric Co; see the document (Q21c_1984-03-07 PCB Disposal.pdf) attached in response to Question 21c. • In 1986, PGE cleaned the oil residue on the evaporation tray of a transformer, disposing of the cleaning rags/pads at the Arlington Landfill; see the document (Q21c_1986-07-29 PCB trans report.pdf) attached in response to Question 21c. • In 1986, two non-leaking capacitors that had been stored in the apprentice training yard at Station L were disposed of at ENSCO, after interim storage at PSC; see the document (Q21c_1986-10-16 PCB trans report.pdf) attached in response to Question 21c. • In 1987, a non-leaking capacitor that had been stored at the EM&C yard at Station L was transported to PSC and placed in stock or reinstalled elsewhere; see the document (Q21c_1987-03-30 PCB trans report.pdf) attached in response to Question 21c.	
63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the	Lavatories and a stormwater drainage system, including catch basins and dry wells, were located at Station L. • During PGE's ownership of Station L, sanitary waste was handled on site by septic tanks/cesspools. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know where, when, or how the septic tanks/cesspools were emptied or maintained at Station L. For further details, see the responses to Questions 13i and	See Question 62 Attachment Q62_1986-09-18_1701 SE Water.pdf

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Property? If the answer to the preceding question is anything but an unqualified "no", identify: a. where the disposal system or floor drains were located; b. when the disposal system or floor drains were installed; c. whether the disposal system or floor drains were connected to pipes; d. where such pipes were located and emptied; e. when such pipes were installed; f. how and when such pipes were replaced or repaired; and g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.	18. • From approximately 1954/1957 until the parcels were sold, stormwater that did not infiltrate into the ground at Station L was managed through as system of drywells, catch basins, stormwater sewer lines, and an oil water separator. For further details, see the responses to Question 13i and 18. o 18 September 1986 – Approximately 60 gallons of PCB-containing oil (0.4 ppm) were released into the gravel and soil at PGE's Market Street Garage when a UST underground oil pipe ruptured; see the document (Q62_1986-09-18_1701 SE Water.pdf) attached in response to Question 62. The released oil drained into two dry wells in the garage parking lot. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD 86-483), contained, and cleaned up (including the PCB-containing absorbent). To the best of PGE's knowledge, after reasonable inquiry, this spill did not reach the Willamette River. o To the best of PGE's knowledge, after reasonable inquiry, PGE is unaware of the discharge of any waste, material, or process residue from the Station L stormwater system to the Willamette River during PGE's ownership.	
64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:		
a. amount of soil excavated;	To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the contaminated soil excavations by PGE or its contractors during the Station L remedial activities (1986-1994): • Between October and November 1986, PGE removed approximately 430 tons of PCB-containing soil (≥50 ppm) in the trench area and near the turbine building; see the document (Q21c_1986-1987 TSCA HW Manifests.pdf) attached in response to Question 21c. • Between June and November 1987 (prior to the consent order), a total of 2,486.9 tons of PCB-containing soil were removed from X Area, Y Area, Stephens Substation (eastern border), the Underground Tank Area, the service road, Conveyor Drive Areas, the Sumps, the Poulsen Building, and the Turbine Area; see the document	See Question 15 Attachments Q15_1987-12-31 HC Removal of PCB Soils & DR.pdf Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf See Question 21 Attachments Q21c_1986-1987 TSCA HW Manifests.pdf Q21c_1989 TSCA HW Manifests.pdf Q21c_1990-08-17 Disposal of PCBs.pdf Q21c_1990-08-24 PGE-Chapman to CWM-Santos.pdf Q21c_1991-02 Hillsboro Dump Tickets.pdf Q21c_1991-08-20 Hillsboro Dump Tickets.pdf

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	(Q15_1987-12-31 HC Removal of PCB Soils & DR.pdf) attached in response to Question 15 and the document (Q21c_1986-1987 TSCA HW Manifests.pdf) attached in response to Question 21c. • In 1988, PGE completed the Phase I consent order requirements by removing approximately 80 tons of soil/sediment from the shoreline adjacent to the turbine building; see the document (Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf) attached in response to Question 15. • In 1990, PGE completed the Phase II consent order requirements by removing a total of 17 tons of sediment and miscellaneous debris from the river; see the document (Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf) attached in response to Question 15. Also see the attached associated documents (Q21c_1990-08-17 Disposal of PCBs.pdf and Q21c_1990-08-24 PGE-Chapman to CWM-Santos.pdf). • Between 1988 and 1994, PGE completed the Phase III consent order requirements by removing more than 10,000 tons of PCB-containing soil/materials, more than 3,000 tons of soils/materials containing non-PCB contaminants (e.g., petroleum hydrocarbons and metals), and other waste/materials (e.g., RCRA waste) from Station L; see the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15 and the documents (Q21c_1989 TSCA HW Manifests.pdf, Q21c_1991-02 Hillsboro Dump Tickets.pdf, Q21c_1991-08-20 Hillsboro Dump Tickets.pdf, Q21c_1992-10-6 Soil Incineration.pdf, Q21c_1994-07-15 Soils Disposal Non-HW Manifest.pdf, Q21c_1994 Soil Certificates.pdf, and Q21c_1994 TSCA HW Manifests.pdf) attached in response to Question 21. • In 1998, during the abandonment of the air sparging remediation system, approximately 4.5 tons of soil were excavated; see the documents (Q21c_1998-02-19 Soils Disposal Non-HW Manifest.pdf and Q21c_1998-03-02 Soils Disposal Non-Haz Manifest.pdf) attached in response to Question 21. In addition, between 1986 and 1993, PGE removed various amounts of soil and gravel in response to spills that occurred at Station L during the remedial actvities; see the response and documents to Question 62 and the documents (Q21c_1986-04-22 PCB trans report.pdf and Q21c_1986-11-06 Spill Disposal.pdf) to Question 21. For further details, see the responses to Questions 15, 21, and 62.	Q21c_1992-10-6 Soil Incineration.pdf Q21c_1994-07-15 Soils Disposal Non-HW Manifest.pdf Q21c_1994 Soil Certificates.pdf Q21c_1994 TSCA HW Manifests.pdf Q21c_1998-02-19 Soils Disposal Non-HW Manifest.pdf Q21c_1998-03-02 Soils Disposal Non-Haz Manifest.pdf See all Question 62 Attachments
b. location of excavation presented on a map or aerial photograph;	See the figures in the documents (Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf and Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15.	See Question 15 Attachments Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf
c. manner and place of disposal and/or storage of excavated soil;	See the response to Question 64a.	
d. dates of soil excavation;	See the response to Question 64a.	

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e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent;	In addition to the soil and gravel excavated/removed by PGE and PGE's consultants during the Station L remedial activities, the following companies excavated soil at Station L: • ODOT – ODOT and its multiple contractors excavated/removed soil during the construction of the Marquam Bridge (1962 to 1966) and the widening of the Marquam Bridge (1985 to 1987); see the responses to Questions 6 and 7 and the document (Q06d_1989 Stolte-PGE Unauthorized Excavation.pdf) attached in response to Question 6d. • OMSI – During/after remediation of the property, OMSI excavated/removed soil during construction activities for their new facility and decommissioning (removal) of USTs. • LifeFlight – SRH, on behalf of LifeFlight (PGE Lessee), excavated/removed soil during the decommissioning of the helicopter pad UST (EY-06); see the document (Q15_1990-03-28_SRH_UST & Soil Helipad Area.pdf) attached in response to Question 15.	See Question 6 Attachment Q06d_1989 Stolte-PGE Unauthorized Excavation.pdf Also see Question 15 Attachment Q15_1990-03-28_SRH_UST & Soil Helipad Area.pdf
f. reason for soil excavation;	Soil excavation at the Station L Substation has occurred from site investigation remediation activities, construction activities, and in response to equipment spills/releases.	
g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;	See the response to Question 64a, which includes the available information on types of constituents contaminating the soil and gravel. The soil contained these constituents due to PGE operations and activities at the property, as well as from spills/releases.	
h. all analyses or tests and results of analyses of the soil that was removed from the Property;	See the response to Question 64a. For soil analytical data/results, see the reports and laboratory results (Q15_1986-07-31 OMNI_Sampling Report.pdf, Q15_1987-02-27 OMNI_Final Soils Invst Report.pdf, Q15_1987-12-31 HC Removal of PCB Soils & DR.pdf, Q15_1987-1988_OMNI Interim Reports 1-12.pdf, Q15_1988-01-21 HC Soil-GW Quality Assessment.pdf, Q15_1988-10-10_OMNI Sampling.pdf, Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf, Q15_1989-1991 SEUA Soil Sampling Docs.pdf, Q15_1990-02-28 Additional Phase 3 Areas.pdf, Q15_1990-03-28_SRH_UST & Soil Helipad Area.pdf, Q15_1990-05-11 Machine Shop Summary.pdf, Q15_1991-06-10 REA Final Rept Pole Yard Aeration.pdf, Q15_1991-1992 CH2M Helipad Cleanup Documents.pdf, Q15_1994-08-09 EPA Site Investigation Report.pdf, Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf, Q15_1982 Lab Results.pdf, Q15_1986 Lab Results.pdf, Q15_1987 Lab Results.pdf, and Q15_1990-1994 Invest Lab Results.pdf) attached in response to Question 15. Also see the documents (Q21c_1986-1987 TSCA HW Manifests.pdf, Q21c_1989 TSCA HW Manifests.pdf, Q21c_1991-02 Hillsboro Dump Tickets.pdf, Q21c_1991-08-20 Hillsboro Dump Tickets.pdf, Q21c_1992-10-6 Soil Incineration.pdf, Q21c_1994-07-15 Soils Disposal Non-HW Manifest.pdf, Q21c_1994 Soil Certificates.pdf, Q21c_1994 TSCA HW Manifests.pdf, Q21c_1998-02-19 Soils Disposal Non-HW Manifest.pdf, and Q21c_1998-03-02 Soils Disposal Non-Haz Manifest.pdf) attached in response to Question 21.	See Question 15 Attachments Q15_1986-07-31 OMNI_Sampling Report.pdf Q15_1987-02-27 OMNI_Final Soils Invst Report.pdf Q15_1987-12-31 HC Removal of PCB Soils & DR.pdf Q15_1987-1988_OMNI Interim Reports 1-12.pdf Q15_1988-01-21 HC Soil-GW Quality Assessment.pdf Q15_1988-10-10_OMNI Sampling.pdf Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf Q15_1989-1991 SEUA Soil Sampling Docs.pdf Q15_1990-02-28 Additional Phase 3 Areas.pdf Q15_1990-03-28_SRH_UST & Soil Helipad Area.pdf Q15_1990-05-11 Machine Shop Summary.pdf Q15_1991-06-10 REA Final Rept Pole Yard Aeration.pdf Q15_1991-1992 CH2M Helipad Cleanup Documents.pdf Q15_1994-08-09 EPA Site Investigation Report.pdf, Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf Q15_1982 Lab Results.pdf Q15_1986 Lab Results.pdf Q15_1987 Lab Results.pdf Q15_1990-1994 Invest Lab Results.pdf

EPA Question	Response	Records/Information Available
		Also see Question 21 Attachments Q21c_1986-1987 TSCA HW Manifests.pdf Q21c_1989 TSCA HW Manifests.pdf Q21c_1991-02 Hillsboro Dump Tickets.pdf Q21c_1991-08-20 Hillsboro Dump Tickets.pdf Q21c_1992-10-6 Soil Incineration.pdf Q21c_1994-07-15 Soils Disposal Non-HW Manifest.pdf Q21c_1994 Soil Certificates.pdf Q21c_1994 TSCA HW Manifests.pdf Q21c_1998-02-19 Soils Disposal Non-HW Manifest.pdf Q21c_1998-03-02 Soils Disposal Non-Haz Manifest.pdf
i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and	In general, spills are cleaned up to remove all visible contamination plus 1 foot laterally. Confirmation sampling was conducted during the Station L remediation (1986 to 1994); see the response to Question 64h.	
j. all persons, including contractors, with information about (a) through (i) of this request.	Multiple individuals have had authority within PGE to access and conduct activities on the Station L. Many are listed on documents attached in response to Question 6g. Also see the documents attached in response to Question 38, for PGE personnel responsible for environmental matters from 1980 to the present. The majority of the soil removal was performed by PGE contractors/consultants; see the response to Question 6b and the response and documents for Questions 15 and 21. Some of the soil removals were performed by personnel from PGE's EM&C construction department; see the responses and documents for Questions 15, 21, and 62. The PGE EM&C construction department foremen include Dan Loftin and Tim Danchok; other PGE EM&C personnel have changed over time.	See Question 6 Attachments Q06g_Bullseye Articles.pdf Q06g_Distribution and System Planning Information.pdf Q06g_HRIS Structure Info 1982-2005.pdf Q06g_Organizational Charts.pdf Also see all Question 15 Attachments Also see all Question 21 Attachments Also see all Question 38 Attachments Also see all Question 62 Attachments
65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.	Yes. Groundwater sampling was conducted during the Station L site investigations from approximately 1987-1994; see the documents (Q15_1988-01-21 HC Soil-GW Quality Assessment.pdf, Q15_1988-05-09 SweetEdwards_GWReport.pdf, Q15_1988-06-09 DEQ Preliminary Site Assessment.pdf, and Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. BTEX concentrations were determined to be above screening criteria in the groundwater beneath Parcel A. Therefore, in 1994, an air sparging remediation system was installed to reduce the BTEX concentrations in the groundwater. At various intervals, groundwater was tested from 1994 to 1998; see the documents (Q15_1993-12-20 Conceptual Design Air Sprg Sys.pdf, Q15_1994-1995 GW Air Sparging Results.pdf, and Q15_1994-1998 CH2M_Air Sparging Progress Reports.pdf) attached in response to Question 15. Also see the responses to Questions 13g, 13h, and 15.	See Question 15 Attachments Q15_1988-01-21 HC Soil-GW Quality Assessment.pdf Q15_1988-05-09 SweetEdwards_GWReport.pdf Q15_1988-06-09 DEQ Preliminary Site Assessment.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf Q15_1993-12-20 Conceptual Design Air Sprg Sys.pdf Q15_1994-1995 GW Air Sparging Results.pdf Q15_1994-1998 CH2M_Air Sparging Progress Reports.pdf

EPA Question	Response	Records/Information Available
66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify: a. reason for groundwater action; b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents; c. all analyses or tests and results of analyses of the groundwater; d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and e. all persons, including contractors, with information about (a) through (c) of this request.	Yes. Because BTEX concentrations were above screening criteria in the groundwater beneath Parcel A, an air sparging remediation system was installed in 1994 to reduce the BTEX concentrations in the groundwater. For groundwater analytical data, see the documents (Q15_1988-01-21 HC Soil-GW Quality Assessment.pdf, Q15_1988-05-09 SweetEdwards_GWReport.pdf, Q15_1988-06-09 DEQ Preliminary Site Assessment.pdf, Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf, Q15_1993-12-20 Conceptual Design Air Sprg Sys.pdf, Q15_1994-1995 GW Air Sparging Results.pdf, and Q15_1994-1998 CH2M_Air Sparging Progress Reports.pdf). Also see the documents (Q50_1993-07-23 CH2MHill to DEQ.pdf, Q50_1993-08-09 DEQ to CH2MHill.pdf, Q50_1994-02-23 CH2MHill-Brown to DEQ-Burnet.pdf, Q50_1994-04-13 CH2MHill-Wuttig to DEQ-Burton.pdf, Q50_1994-05-12 CH2MHill-Wuttig to WRD-Carter.pdf, and Q50_1994-06-20 CH2MHill-Wuttig to WRD-Carter.pdf) attached in response to Question 50. Due to the decline of BTEX concentrations in groundwater beneath Parcel A and because the air sparging remediation system had reached its threshold of effectiveness, the air sparging remediation system was abandoned in January 1998, including the abandonment of the monitoring wells (W-8 through W-11) and process wells (AS-1 through AS-7); see the document (Q15_1998-07-23 Well Abandonment Plan.pdf) attached in response to Question 15 and the documents (Q50_1997-12-29 DEQ-Kiernan to PGE-Norton.pdf, Q50_1998-01-16 PGE-Norton to DEQ-Kiernan.pdf, and Q50_1998-01-22 DEQ-Kiernan to PGE-Norton.pdf) attached in response to Question 50.	See Question 15 Attachments Q15_1988-01-21 HC Soil-GW Quality Assessment.pdf Q15_1988-05-09 SweetEdwards_GWReport.pdf Q15_1988-06-09 DEQ Preliminary Site Assessment.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf Q15_1993-12-20 Conceptual Design Air Sprg Sys.pdf Q15_1994-1995 GW Air Sparging Results.pdf Q15_1994-1998 CH2M_Air Sparging Progress Reports.pdf Q15_1998-07-23 Well Abandonment Plan.pdf Also see Question 50 Attachments Q50_1993-07-23 CH2MHill to DEQ.pdf Q50_1993-08-09 DEQ to CH2MHill.pdf Q50_1994-02-23 CH2MHill-Brown to DEQ-Burnet.pdf Q50_1994-04-13 CH2MHill-Wuttig to DEQ-Burton.pdf Q50_1994-05-12 CH2MHill-Wuttig to WRD-Carter.pdf Q50_1994-06-20 CH2MHill-Wuttig to WRD-Carter.pdf Q50_1997-12-29 DEQ-Kiernan to PGE-Norton.pdf Q50_1998-01-16 PGE-Norton to DEQ-Kiernan.pdf Q50_1998-01-22 DEQ-Kiernan to PGE-Norton.pdf
67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unqualified "no", identify: a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged; b. the dates of each such occurrence; c. the amount and location of such	To the best of PGE's knowledge, after reasonable inquiry, the following summary incorporates information with respect to specific releases into the Willamette River that have occurred at Station L: • 3 April 1971 - To the best of PGE's knowledge, after reasonable inquiry, approximately 2 gallons of PCB-containing oil (askarel oil >500 ppm) were released onto the transformer storage area platform, located at the southwest corner of the turbine building, and to the soil and vegetation beside the platform (Willamette shoreline) when a stored transformer (KX17) failed. PGE personnel cleaned up the spill on the platform using a solvent (1500) to remove the oil. Winter river flooding and rains apparently released the PCB-contaminated soil beside the platform to the river. See the PGE memorandums related to this 1971 spill (Q62_1987-06-15 Memo on Historical PCB.pdf, Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf, Q62_1987-06-24_PGE Phone Memo_1971 spill.pdf) attached in response to Question 62. This release to the Willamette River, as well as several upland (soil) PCB-containing oil releases, were discovered in 1986 during site investigations of Station L conducted by	See all Question 15 Attachments Also see Question 21 Attachments Also see Question 50 Attachments Q50_1988-08-03 DEQ Order of Consent.pdf Q50_1991-04-17 Cert of Completion for Phase I & II.pdf Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf Q50_1993-11-16 DEQ Order of Completion.pdf Q50_1994-09-26 Phase III ROD.pdf Also see Question 62 Attachments Q62_1987-06-15 Memo on Historical PCB.pdf Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf Q62_1987-06-24_PGE Phone Memo_1971 spill.pdf

EPA Question	Response	Records/Information Available
release; d. were sheens on the river created by the release; e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.	PGE to fulfill the OMSI donation contingency (Parcels A-F were donated to OMSI in December 1986 with the contingency that PGE would cleanup all soils contaminated with PCBs and other materials). The releases were reported to the Oregon DEQ and the USEPA. PGE entered into Oregon DEQ's Voluntary Cleanup Program in 1987. In August 1988, PGE entered into a three-phase consent order (DEQ No. ECSR-NWR-88-02) to identify the nature and extent of hazardous substances over the entire Station L property (Parcels A through I) and Stephens Substation (addressed in a separate 104(e) response); see the document (Q50_1988-08-03 DEQ Order of Consent.pdf) attached in response to Question 50. Under Phase I and Phase II consent order requirements, PGE completed the remediation of PCB-contaminated river sediments in 1990 (removal of sediments to 1 ppm and capping of the remaining sediment). In April 1991, the Oregon DEQ issued a certificate of completion indicating that PGE had met the Phase I and Phase II consent order requirements; see the document (Q50_1991-04-17 Cert of Completion for Phase I & II.pdf) attached in response to Question 50. Additional upland soil releases were discovered during the Phase III site investigations, including a release from a leaking UST; see the attached document (Q62_1989-12-12 DEQ LUST Info.pdf). Upland soil at Station L was remediated for PCBs (to 1 ppm), PAHs, TPH, VOCs, and metals. Under Phase III consent order requirements, PGE completed the remediation of the uplands portion of Station L in 1994. See response and documents (Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf, Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf, and Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached for Question 15. In June 1991, PGE received a "NFA" determination for the USTs at Station L; see the document (Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf) attached in response to Question 50. In November 1993, the Oregon DEQ issued an Order of Completion for Station L Phase III; see the document (Q50_1993-11-16 DEQ Order of Completion.pdf) attached in response to Question 50. In September 1994, PGE received a final "NFA" for Station L in Oregon DEQ's Station L Phase III ROD; see the document (Q50_1994-09-26 Phase III ROD.pdf) attached in response to Question 50. The USEPA completed a Site Investigation of Station L in August 1994; see the document (Q15_1994-08-09 EPA Site Investigation Report.pdf) attached in response to Question 15. Based on their site investigation and other pertinent information, the USEPA found it appropriate to refer to state authority for Station L and did not anticipate further investigation for Station L under the Federal Superfund Program. Also see the responses and documents for Questions 15 and 21. • 10 April 1980 and 9 June 1980 – Two non-PGE sourced discharges occurred from the storm drain that runs through Station L into the Willamette River; see the document	Q62_1989-12-12 DEQ LUST Info.pdf Q62_1980_Non-PGE Sourced Spills.pdf

EPA Question	Response	Records/Information Available
	(Q62_1980_Non-PGE Sourced Spills.pdf) attached in response to Question 62. PGE reported these non-PGE discharges to the Oregon DEQ.	
68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s) or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.	To the best of PGE's knowledge, after reasonable inquiry, the following summary incorporates information with respect to specific PCB-containing releases at Station L and the nature of the clean up responses: • 3 April 1971 - To the best of PGE's knowledge, after reasonable inquiry, approximately 2 gallons of PCB-containing oil (askarel oil >500 ppm) were released onto the transformer storage area platform, located at the southwest corner of the turbine building, and to the soil and vegetation beside the platform (Willamette shoreline) when a stored transformer (KX17) failed. PGE personnel cleaned up the spill on the platform using a solvent (1500) to remove the oil. Winter river flooding and rains apparently released the PCB-contaminated soil beside the platform to the river. See the PGE memorandums related to this 1971 spill (Q62_1987-06-15 Memo on Historical PCB.pdf, Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf, Q62_1987-06-24_PGE Phone Memo_1971 spill.pdf) attached in response to Question 62. This release to the Willamette River, as well as several upland (soil) PCB-containing oil releases, were discovered in 1986 during site investigations of Station L conducted by PGE to fulfill the OMSI donation contingency (Parcels A-F were donated to OMSI in December 1986 with the contingency that PGE would cleanup all soils contaminated with PCBs and other materials). The releases were reported to the Oregon DEQ and the USEPA. PGE entered into the Oregon DEQ's Voluntary Cleanup Program in 1987. In August 1988, PGE entered into a three-phase consent order (DEQ No. ECSR-NWR-88-02) to identify the nature and extent of hazardous substances over the entire Station L property (Parcels A through I) and Stephens Substation (addressed in a separate 104(e) response); see the document (Q50_1988-08-03 DEQ Order of Consent.pdf) attached in response to Question 50. Under Phase I and Phase II consent order requirements, PGE completed the remediation of PCB-contaminated river sediments in 1990 (removal of sediments to 1 ppm and capping of the remaining sediment). In April 1991, the Oregon DEQ issued a certificate of completion indicating that PGE had met the Phase I and Phase II consent order requirements; see the document (Q50_1991-04-17 Cert of Completion for Phase I & II.pdf) attached in response to Question 50. Additional upland soil releases were discovered during the Phase III site investigations, including a release from a leaking UST; see the attached document (Q62_1989-12-12 DEQ LUST Info.pdf). Upland soil at Station L was remediated for PCBs (to 1 ppm), PAHs, TPH, VOCs, and metals. Under Phase III consent order requirements, PGE completed the remediation of the uplands portion of Station L in 1994. See response and documents (Q15_1988-11-21 HAI CR- Phase I Removal of	See Question 15 Attachments Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf Q15_1994-08-09 EPA Site Investigation Report.pdf Also see Question 21 Attachments Q21a_1986-11-07 Eq list & PCB results.pdf Q21c_1979-04-03 Invoice.pdf Q21c_1984-03-07 PCB Disposal.pdf Q21c_1986-04-22 PCB trans report.pdf Q21c_1986-07-29 PCB trans report.pdf Q21c_1986-10-16 PCB trans report.pdf Q21c_1986-11-06 Spill Disposal.pdf Q21c_1987-03-30 PCB trans report.pdf Also see Question 50 Attachments Q50_1988-08-03 DEQ Order of Consent.pdf Q50_1991-04-17 Cert of Completion for Phase I & II.pdf Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf Q50_1993-11-16 DEQ Order of Completion.pdf Q50_1994-09-26 Phase III ROD.pdf Also see Question 51 Attachments Q51_1986-04-18&30 Spill Correspondances.pdf Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf Q51_1986-10-14 EPA Inspection PCB Violations.pdf Q51_1986-11-14 EPA - TSCA Violation.pdf Q51_1986-11-19 Sta L Memo_Spill.pdf Q51_1986-12-03 Sta L Spill Procedures.pdf Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf Also see Question 62 Attachments Q62_1987-06-15 Memo on Historical PCB.pdf Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf Q62_1987-06-24_PGE Phone Memo_1971 spill.pdf

EPA Question	Response	Records/Information Available
	PCBs.pdf, Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf, and Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached for Question 15. In June 1991, PGE received a "NFA" determination for the USTs at Station L; see the document (Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf) attached in response to Question 50. In November 1993, the Oregon DEQ issued an Order of Completion for Station L Phase III; see the document (Q50_1993-11-16 DEQ Order of Completion.pdf) attached in response to Question 50. In September 1994, PGE received a final "NFA" for Station L in Oregon DEQ's Station L Phase III ROD; see the document (Q50_1994-09-26 Phase III ROD.pdf) attached in response to Question 50. The USEPA completed a Site Investigation of Station L in August 1994; see the document (Q15_1994-08-09 EPA Site Investigation Report.pdf) attached in response to Question 15. Based on EPA's site investigation and other pertinent information, the USEPA found it appropriate to refer to state authority for Station L and did not anticipate further investigation for Station L under the Federal Superfund Program. Also see the response and documents for Questions 15 and 21. • 18 April 1986 – Approximately 5-25 gallons of PCB-containing oil (91-107 ppm) from an oil tank spilled onto gravel in the Station L tank farm; see the document (Q62_1986-04-18 Spill Report.pdf) attached in response to Question 62. The spill occurred during the transfer of insulating oil into a holding tank. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD 86-203), contained, and cleaned up (including the removal and disposal of the PCB-containing gravel and soil. The PCB and petroleum hydrocarbon-containing soil/gravel was disposed of at the Arlington Landfill after interim storage at PSC, a PGE waste and used materials handling facility; see the document (Q21c_1986-04-22 PCB trans report.pdf) attached in response to Question 21c. Also see the response and documents (Q51_1986-04-18&30 Spill Correspondances.pdf, Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf, Q51_1986-10-14 EPA Inspection PCB Violations.pdf, Q51_1986-11-14 EPA - TSCA Violation.pdf, Q51_1986-11-19 Sta L Memo_Spill.pdf, Q51_1986-12-03 Sta L Spill Procedures.pdf, Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf, Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf, Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf, and Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf) attached for Question 51. • 30 April 1986 – Approximately 1 gallon of PCB-containing oil (66 ppm) from an oil tank spilled onto gravel in the Station L tank farm; see the document (Q62_1986-04-30 Spill Report.pdf) attached in response to Question 62. The spill occurred during the PCB-containing oil decontamination activities by Sun Ohio Corporation. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD 86-178), contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the PCB and petroleum hydrocarbon-containing soil/gravel was likely disposed of at Arlington	Q62_1989-12-12 DEQ LUST Info.pdf Q62_1986-04-18 Spill Report.pdf Q62_1986-04-30 Spill Report.pdf Q62_1986-09-18_1701 SE Water.pdf Q62_1986-11-06 Oil Spill Report.pdf Q62_1987-01-28 Oil Spill Questionaire.pdf Q62_1987-03-16 Oil Spill Questionaire.pdf Q62_1988-06-07 Oil Spill Questionaire.pdf Q62_1993-09-13 Oil Spill Report.pdf

EPA Question	Response	Records/Information Available
	Landfill after interim storage at a PGE waste and used materials handling facility. Also see the response and documents (Q51_1986-04-18&30 Spill Correspondances.pdf, Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf, Q51_1986-10-14 EPA Inspection PCB Violations.pdf, Q51_1986-11-14 EPA - TSCA Violation.pdf, Q51_1986-11-19 Sta L Memo_Spill.pdf, Q51_1986-12-03 Sta L Spill Procedures.pdf, Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf, Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf, Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf, and Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf) attached for Question 51. • 18 September 1986 – Approximately 60 gallons of PCB-containing oil (0.4 ppm) were released into the gravel and soil at PGE's Market Street Garage when a UST underground oil pipe ruptured; see the document (Q62_1986-09-18_1701 SE Water.pdf) attached in response to Question 62. The released oil drained into two dry wells in the garage parking lot. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD 86-483), contained, and cleaned up (including the PCB-containing absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB and petroleum hydrocarbon-containing absorbent was likely disposed of at the Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 6 November 1986 – Approximately 2 gallons of PCB-containing oil (approximately 300 ppm) from Oil Storage Tank #6 were spilled onto the gravel in the Station L tank farm; see the document (Q62_1986-11-06 Oil Spill Report.pdf) attached in response to Question 62. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). The PCB and petroleum hydrocarbon-containing soil/gravel was disposed of at the Arlington Landfill after interim storage at Sellwood Substation, a PGE waste and used materials handling facility; see the document (Q21c_1986-11-06 Spill Disposal.pdf) attached in response to Question 21. • 28 January 1987 – Approximately 10-15 gallons of PCB-containing oil (77 ppm) were released onto the gravel and migrated to surface water within the Station L tank farm; see the document (Q62_1987-01-28 Oil Spill Questionaire.pdf) attached in response to Question 62. The spill occurred when a tanker truck leaked while transferring oil to containers within the tank farm. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel, soil, and absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB- and petroleum hydrocarbon-containing soil/gravel/absorbent was likely disposed of at Arlington Landfill after interim storage at a PGE waste and used materials handling facility. Confirmation sampling was conducted to ensure cleanup; the confirmation composite soil sample had a PCB concentration of 0.32 ppm. • 16 March 1987 – Approximately 5 gallons of PCB-containing oil (20 ppm) spilled onto	

EPA Question	Response	Records/Information Available
	gravel in the Station L tank farm; see the document (Q62_1987-03-16 Oil Spill Questionaire.pdf) attached in response to Question 62. The spill occurred when the oil shifted in a tanker and spilled out of the top lid during filling activities. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the petroleum hydrocarbon-containing soil/gravel was likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. Confirmation soil sampling results were all less than 1 ppm PCB. • 23 April 1987 – Approximately 45 gallons of PCB-containing oil (1 ppm) were released from a pole-mounted transformer onto the gravel in the Station L storage yard when a truck struck the pole. To the best of PGE's knowledge, after reasonable inquiry, the petroleum hydrocarbon-containing soil/gravel was likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 7 June 1988 – Approximately 0.03 gallons of PCB-containing insulating oil (35 ppm) and water from an emptied 5 kVA transformer were released onto the asphalt at Station L; see the document (Q62_1988-06-07 Oil Spill Questionaire.pdf) attached in response to Question 62. The spill was caused when thieves tipped over a training transformer (empty with some water inside). The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB- and petroleum hydrocarbon-containing absorbent was likely disposed of at Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 13 September 1993 – Approximately 1 gallon of PCB-containing oil (9 ppm) from a concrete fuel tank spilled onto gravel; see the document (Q62_1993-09-13 Oil Spill Report.pdf) attached in response to Question 62. The spill occurred while EMCON (a PGE contractor) was sampling the tank, which was believed to have been empty. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the approximately 8 cubic feet of petroleum hydrocarbon-containing soil/gravel were likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. PGE had oil-filled equipment on various portions of the Station L property including Station L Power Plant equipment (early 1900s to 1975), Lincoln Substation equipment (early 1900s to 1975/1986), and stored electrical equipment (from sometime prior to 1966 to 1986/2005). PCB-containing oils were used in electrical equipment (i.e., capacitors and transformers) at Station L from sometime after 1929, the earliest generalized marketing of PCBs in the United	

EPA Question	Response	Records/Information Available
	States, until site closure in 1975. Insulating oil (a type of mineral oil) in the other electrical equipment at the site (e.g., circuit breakers and transformers) may have contained PCBs as a result of cross-contamination during oil replacement and retrofitting. The attached document (Q21a_1986-11-07 Eq list & PCB results.pdf) lists the oil-filled substation equipment at Station L (likely Lincoln Substation) in 1986. The transformer capacity records provided in a supplemental submittal (Supplemental Submittal S8) list the power generating equipment at Station L from 1936 to 1978, some of which may have been located in Stephens Substation since it was originally considered part of Station L. Other oil-filled equipment transportation, disposal, or cleaning documents include: • In 1979, a capacitor from Station L (may have actually been Stephens Substation) and multiple capacitors from several PGE locations outside of the Investigation Area (e.g., Sellwood, Progress, and Urban Substations) were stored at the EM&C storage yard within Station L prior to disposal at Arlington Landfill; see the document (Q21c_1979-04-03 Invoice.pdf) attached in response to Question 21c. • In 1984, to the best of PGE's knowledge, after reasonable inquiry, approximately 6,000 gallons of PCB-containing oil, drained from electrical equipment and/or USTs and stored in mobile storage skid in the east side yard at Station L, were disposed at the Union Electric Co; see the document (Q21c_1984-03-07 PCB Disposal.pdf) attached in response to Question 21c. • In 1986, PGE cleaned the oil residue on the evaporation tray of a transformer, disposing of the cleaning rags/pads at the Arlington Landfill; see the document (Q21c_1986-07-29 PCB trans report.pdf) attached in response to Question 21c. • In 1986, two non-leaking capacitors that had been stored in the apprentice training yard at Station L were disposed of at ENSCO, after interim storage at PSC; see the document (Q21c_1986-10-16 PCB trans report.pdf) attached in response to Question 21c. • In 1987, a non-leaking capacitor that had been stored at the EM&C yard at Station L was transported to PSC and placed in stock or reinstalled elsewhere; see the document (Q21c_1987-03-30 PCB trans report.pdf) attached in response to Question 21c. See the responses to Questions 15, 21, 47, and 62. Also see the annual PCB reports (1978-2008) for PGE (all PGE sites combined), which are provided in a supplemental submittal (Supplemental Submittal S3).	
69. For any releases or threatened releases of PCB(s) and/or PCB(s)	See the responses to Questions 62 and 68.	

EPA Question	Response	Records/Information Available
containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release. Provide all documentation regarding, but not limited to, the following releases:		
a. a May 20, 1988 release of 20 gallons of 400 parts per million PCB transformer oil; b. a February 9, 1995 release of 5 gallons of oil that spilled from a bushing on the ground; c. a February 24, 1997 release of 20 gallons of 19 parts per million PCB transformer oil onto the ground, and; d. a July 25, 1997 release of 3 gallons of less than 5 parts per million PCB oil from a break on the ground, and;. e. a December 4, 1997 release of 40 gallons of cable oil onto the ground following vandalism at the Harborton substation.	Not applicable. Questions 69a through 69e are not relevant to Station L. Information regarding these investigations is provided in the 104(e) response for the Harborton Substation.	
Section 7.0 - Property Investigations		
70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the	A loss prevention inspection was conducted by Arkwright Mutual Insurance for the east side storage and central division garage at Station L in 1983; see the attached document (Q70_1984-01-16_LPR Report & PGE Memos.pdf). The attached documents (Q70_1989-02-09 Asb Removal OMSI Insurance.pdf and Q70_1989-02-16 Asb Removal PAS Insurance.pdf) relate to general commercial liability and certificates of insurance for the asbestos abatement activities at Station L in 1989. The attached document	Question 70 Attachments Q70_1984-01-16_LPR Report & PGE Memos.pdf Q70_1989-02-09 Asb Removal OMSI Insurance.pdf Q70_1989-02-16 Asb Removal PAS Insurance.pdf Q70_1994-08-14 Sta L Certificate of Insurance.pdf

EPA Question	Response	Records/Information Available
conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.	(Q70_1994-08-14 Sta L Certificate of Insurance.pdf) is a general certificate of insurance for PGE issued in 1994. An engineer from PGE's office of Facilities Management (FM) conducts several inspections a year at most PGE locations. The engineer will do a complete walk through of each facility looking for fire hazards and will issue a recommendation when a problem is found. Along with these inspections, the fire protection systems and equipment are checked and usually functionally tested. There are locations that are inspected by FM which do not require the issuing of an inspection report. These locations are small substations where there are only pressure vessels located on the system circuit breakers. This inspection is required by the State of Oregon. Following the inspection, the inspector will send his report to the State so they can keep up to date on the condition of PGE pressure vessels. To the best of PGE's knowledge, after reasonable inquiry, FM inspections were conducted at Station L during PGE's ownership/operation. Copies of PGE's relevant general liability insurance policies are provided in a supplemental submittal (Supplemental Submittal S4).	
71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property, Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.	To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the reports, information, or data PGE has related to soil, water (ground and surface), or air quality and geology/hydrogeology at Station L: • In 1957, Dames & Moore, on behalf of PGE, conducted a foundation investigation, including determination of soil conditions, for the then-proposed oil tank farm at Station L; see the document (Q15_1957-04-05 Foundation Invst of Oil Strg Tanks.pdf) attached in response to Question 15. To the best of PGE's knowledge, after reasonable inquiry, this oil tank farm, including an AST, was installed at Station L in approximately 1957/1958. After retirement of the Station L power plant in 1975, PGE evaluated several alternatives for the future development of Station L, including donation of the property. • In 1982, PGE performed an internal health and safety evaluation of the welding shop; see the documents (Q15_1982 Station L HS Weld Shop.pdf and Q15_1982 Lab Results.pdf) attached in response to Question 15. • In 1983, PGE performed an internal hazardous/toxic substance inventory at Station L, which identified ACM see the attached document (Q15_1983-10-25 Sta L Toxic-Haz Substance Memo.pdf). • In 1984, several contractors contributed to a Station L Master Plan to evaluate the options for Station L development. As part of the Master Plan analysis phase, Foundation Sciences Inc performed soil and geotechnical engineering evaluations at	See Question 4 Attachments Q04_2006 Plats.pdf Q04_Plats.pdf Also see all Question 15 Attachments Also see Question 19 Attachments Q19_1980 SPCC.pdf Q19_1980 SPCC.pdf Also see all Question 21 Attachments Also see all Question 50 Attachments Also see all Question 52 Attachments Also see all Question 62 Attachments

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	Station L; see the documents (Q15_1984-01-27 SERA_Phase I.pdf and Q15_1984-04-00 SERA Prelim Geotech Eng Invst.pdf) attached in response to Question 15. • In 1986, Daly Engineering Company conducted an ambient noise/sound study at Station L; see the document (Q15_1986-05-20 Daly_Envi Sound Report.pdf) attached in response to Question 15. • In 1986, Geotechnical Resources Inc monitored the three inclinometers, which were installed in 1984 by Foundation Sciences Inc during the Master Plan analysis; see the document (Q15_1986-06-23 GRI Inclinometer Report.pdf) attached in response to Question 15. PGE decided to donate the northern 18 acres of Station L (Parcels A through F) to OMSI. Title for this portion of Station L passed from PGE to OMSI on 31 December 1986. Because PGE had stored electrical equipment containing PCBs in some areas of Station L, PGE retained the responsibility for cleaning up PCB contamination and for the removal of all ACM on the donated land as a contingency of the OMSI donation. To fulfill this voluntary obligation, PGE embarked on an uplands investigation and cleanup program at Station L. • In July, September, and August 1986, OMNI collected environmental samples (soil, pavement, manhole/catch basin) at the Station L trench area. The samples were analyzed for PCBs. See the documents (Q15_1986-07-31 OMNI_Sampling Report.pdf, Q15_1986 Lab Results.pdf, and Q15_1987-02-27 OMNI_Final Soils Invst Report.pdf) attached in response to Question 15. • The soil testing at the trench area and near the turbine building identified areas of PCB contamination (≥50 ppm). PGE removed surface soil at locations of elevated PCB concentrations in 1986, resulting in the disposal of approximately 430 tons of soil rock, and solid waste cleanup material between October and November 1986 at the Arlington Landfill; see the document (Q21c_1986-1988 HW Manifests.pdf) attached in response to Question 21c. • In 1986/1987, ACM was removed from the old transformer storage yard. During the asbestos removal, HMS conducted asbestos air monitoring; see the document (Q15_1986-09-15 Asbestos Air Sampling.pdf) attached in response to Question 15. The results of the monitoring were below the OSHA limit. The approximately 8 to 9 cubic yards of ACM were disposed of at the Circle C Landfill in March 1987; see the documents (Q21c_1987-03-12 Bill of Lading.pdf and Q21c_1987-08-19 Bill of Lading.pdf) attached in response to Question 21c. • Between January and May 1987, OMNI collected soil and materials samples at the river shoreline, the turbine room (exterior, interior, and platform), Lincoln Substation (interior), EM&C storage building (interior), machine shop, underground tank area, X and Y Areas, the eastern boarder of Stephens Substation, the service road, the	

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	conveyer drive system, and one sample within the tank farm. The samples were analyzed for PCBs. See the 1987 Interim Report Numbers 1-3 within the document (Q15_1987-1988_OMNI Interim Reports 1-12.pdf) attached in response to Question 15. • The soil testing conducted between January and May 1987, identified areas of PCB contamination (≥50 ppm), including several upland locations (e.g., X and Y Areas, the service road, and the turbine building), as well as at the river shoreline adjacent to the turbine room. See the 1987 lab results in the document (Q15_1988-1989 Lab Results.pdf) attached in response to Question 15. River sediment contamination was not suspected at Station L prior to the uplands site investigations. During the initial uplands investigation, however, it became apparent that the potential existed for PCB-contaminated oil to have migrated into the river, west of the turbine building. In addition to further uplands investigations, PGE sampled and analyzed the river water and sediment, which resulted in PCB detections in the sediment. PGE collected additional sediment samples to determine the extent of contamination and found that an approximately 80- by 120-foot area contained PCB concentrations ranging from non-detect to 286 ppm. Based on the nature and extent of PCB-contamination of sediment, it appeared that the PCBs came from a source at the edge of the river next to the turbine building. A review of historical PGE records showed that a transformer on the west side of the turbine building failed in April 1971 and released askarel oil (>500 ppm PCBs). • In June 1987, OMNI collected further environmental samples (soil, rocks, asphalt, materials) in the uplands area of Station L, as well as sediment samples in the river adjacent to the turbine building; see the 1987 Interim Report 4 within the document (Q15_1987-1988_OMNI Interim Reports 1-12.pdf) attached in response to Question 15, as well as the sediment document (Q15_1987-07-06 OMNI Underwater Sed Samp.pdf) attached in response to Question 15. • For further information on the 1971 release, see the response and documents (Q62_1987-06-15 Memo on Historical PCB.pdf, Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf, and Q62_1987-06-24_PGE Phone Memo_1971 spill.pdf) attached to Question 62. In June 1987, PGE entered into Oregon DEQ's Voluntary Cleanup Program. PGE began soil, sediment, surface water, and groundwater investigations under the cleanup program. In March 1988, PGE submitted a RAP to the Oregon DEQ for remediation of PCB-contaminated sediments next to the turbine building. The Oregon DEQ requested that PGE enter into a consent order covering the entire Station L facility before PGE began its proposed remedial action. • Between July 1987 and May 1988, OMNI conducted further environmental and confirmatory sampling at Station L; see the Interim Reports 5-12 within the document (Q15_1987-1988_OMNI Interim Reports 1-12.pdf) attached in response to Question	

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	15. Also see the internal PGE memo concerning an agency meeting on shoreline sampling (Q15_1987-07-02 Sta L Memo of Agency Meeting.pdf) attached in response to Question 15. • In July 1987, Hart Crowser completed the Voluntary PCB Cleanup Plan; see the document (Q15_1987-07-06 HC Vol PCB Cleanup Plan.pdf) attached in response to Question 15. Also see the associated proposal and scoping document (Q15_1987-04-17_HC RAP & Soil-GW Scoping.pdf) attached in response to Question 15. • Between August 1987 and March 1988, Hart Crowser completed several other Station L evaluations and reports; see the documents (Q15_1987-07-13 HC_Phase II River Sed Asmt.pdf, Q15_1987-08-11 EnvTox Rev of EPA Risk Criteria.pdf, Q15_1987-08-26 HC correspondence to PGE-OMSI.pdf, Q15_1987-12-17 HC Concept WP-River Sediment.pdf, Q15_1988-01-21 HC Soil-GW Quality Assessment.pdf, Q15_1988-01-29 HC Offshore Sediment Sampling.pdf, and Q15_1988-03-28 HC Sediment Quality.pdf) attached in response to Question 15. • In December 1987, Hart Crowser completed a report on the removal of PCB-containing soils at Station L between June and November 1987; see the document (Q15_1987-12-31 HC Removal of PCB Soils & DR.pdf) attached in response to Question 15. A total of 2,486.9 tons of soil were removed from X Area, Y Area, Stephens Substation (eastern border), the Underground Tank Area, the service road, Conveyor Drive Areas, the Sumps, the Poulsen Building, and the Turbine Area. The removed soil was disposed of at Arlington Landfill; see the manifests (Q21c_1986-1988 HW Manifests.pdf) attached in response to Question 21c. • In February 1988, Hart Crowser completed the RAP; see the documents (Q15_1988-02-29 HC RAP Vol I.pdf and Q15_1988-02-29 HC RAP Vol II.pdf) attached in response to Question 15. Also see the associated documents (Q15_1988-02-24_HC Eval and RAP Propsal-Scoping.pdf, Q15_1988-04-13 Pipeline Dredging.pdf, and Q15_1988-04-19 HC to PGE RE-Sediment in RAP.pdf) attached in response to Question 15. • In May 1988, Sweet Edwards completed a report on the 1987 groundwater investigations at Station L; see the document (Q15_1988-05-09 SweetEdwards_GWReport.pdf) attached in response to Question 15. • In June 1988, the Oregon DEQ completed a preliminary assessment of Station L, concluding that further investigation of the site was warranted; see the document (Q15_1988-06-09 DEQ Preliminary Site Assessment.pdf) attached in response to Question 15. • In June 1988, Dames & Moore completed a report on the remediation alternatives for the PCB-contaminated river sediments adjacent to the turbine building; see the	

EPA Question	Response	Records/Information Available
	document (Q15_1988-06-17 D&M_PCB River Sed Alternatives.pdf) attached in response to Question 15. In August 1988, PGE entered into a three-phase consent order (DEQ No. ECSR-NWR-88-02) to identify the nature and extent of hazardous substances over the entire Station L property (Parcels A through I) and Stephens Substation (addressed in a separate 104(e) response); see the document (Q50_1988-08-03 DEQ Order of Consent.pdf) attached in response to Question 50. Phase I investigated/remediated the PCB contamination of the Willamette River shoreline (above the ordinary low water line) adjacent to the turbine building, Phase II investigated/remediated the PCB contamination of the Willamette River underwater sediments (below the ordinary low water line), and Phase III investigated/remediated hazardous substances contamination (if any) of groundwater, surface water, structures, soils, and other Station L sediments. In 1989, under the OMSI donation contingency, PGE removed the remaining ACM from Station L; see the documents (Q15_1989-01-09 Tech Spec for Asbestos Abatement.pdf and Q15_1989-05-22 Hazcon Asbestos Data.pdf) attached in response to Question 15. Approximately 930 tons of ACM were removed and disposed of at the St Johns Landfill; see the documents (Q21c_1989-10 St. Johns Landfill Receipts.pdf and Q21c_1989 St. Johns Landfill Receipts.pdf) attached in response to Question 21. Treated (filtered) ACM-contaminated waste water, generated from washing equipment, building interiors, personnel, was discharged to the municipal sanitary sewer under a City of Portland special discharge permit; see the documents (Q52_1989-06-14 Special Permit Request.pdf, Q52_1989-06-30 Wastewater Discharge Permit.pdf, Q52_1989-09-22 Permit Modification.pdf, Q52_1989-09-25 Permit Modification.pdf, and Q52_1989-10-05 Asbestos Permit Modification.pdf) attached in response to Question 52. During the discharges, asbestos-containing water was inadvertently discharged to the sewer due to an apparent failure in the filtration system. For further details, see the responses to Questions 13g, 15, 21, and 51. In February 1990, the Oregon DEQ selected the hybrid low-volume dredging and capping sediment remediation alternative; see the Phase II ROD (Q50_1990-02-26 Phase II ROD.pdf) attached in response to Question 50. During the Station L Phase I, II, and III investigations, many reports were completed by PGE or its consultants documenting the progression and completion of the Station L investigations and remediation; see the documents (Q15_1989-08-07 CH2MH RAP Modifications.pdf, Q15_1989-08-08 CH2MH Willamette River Sampling.pdf, Q15_1988-10-10_OMNI Sampling.pdf, Q15_1989-11-00 CH2MH_Phase III Revised WP.pdf, Q15_1989 SOG Documents.pdf, Q15_1989 FredDevine Pre-Cap Inspection.pdf, Q15_1989-1991 SEUA Soil Sampling Docs.pdf, Q15_1990-02-06 Jan - Feb. Highlights.pdf, Q15_1990-02-28 Additional Phase 3 Areas.pdf, Q15_1990-03-02 Feb. Highlights.pdf, Q15_1990-03-30 ESD Activities.pdf, Q15_1990-04-23 PGE Sediment Test Results.pdf, Q15_1990-05-11 Machine Shop Summary.pdf, Q15_1990-06 Phase 3 Assessment Level WP.pdf, Q15_1990-07-18 Reidel Sediment Work Clarif.pdf, Q15_1990-07 CH2M_PCB River Sed Design Rept.pdf, Q15_1991-06-10 REA Final Rept Pole Yard Aeration.pdf, Q15_1991-07-11 Daily Log Data.pdf, Q15_1991-1992 CH2M Helipad Cleanup Documents.pdf,	

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	Q15_1992-07 CH2M_Phase III_GW Invest WP_Final.pdf, and Q15_1993-12-20 Conceptual Design Air Sprg Sys.pdf) attached in response to Question 15, as well as the 1988-1993 Station L Progress Reports (Q50_1988-1993 PGE Progress Reports.pdf) attached in response to Question 50. Also see the lab results (Q15_1986-1988 UST Internal Memos.pdf, Q15_1987 Lab Results.pdf, Q15_1988-1989 Lab Results.pdf, and Q15_1990-1994 Invest Lab Results.pdf) attached in response to Question 15. In addition, the document (Q15_1990-03-28_SRH_UST & Soil Helipad Area.pdf) attached in response to Question 15 is the 1990 UST Removal and Soil Sampling Report: Helicopter Refueling Station, which was completed by SRH for Life Flight (PGE lessee). Notable Station L investigation reports include: • The 1988 Phase I Completion Report: Removal of PCBs from Area A; see the document (Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf) attached in response to Question 15. The area was remediated to an average concentration of 1 ppm PCBs. A total of approximately 80 tons of soil/sediment were excavated. A total of approximately 174.3 tons of soil/sediment, debris, and concrete were removed and disposed of at the Envirosafe Services of Idaho Inc landfill. • The 1989 Final RAP; see the document (Q15_1989-11-00 CH2MH Final RAP.pdf) attached in response to Question 15. • The 1991 Phase II Final Report: Station L PCB-Contaminated River Sediment Remediation; see the document (Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf) attached in response to Question 15. The river was remediated to an average concentration of 1 ppm PCBs. A total of 535,700 gallons of water were processed with the sediment dewatering and water treatment facility and then discharged back into the river. A total of 17 tons of sediment and miscellaneous debris were removed. The 17 tons of sediment/debris and 23.5 tons of carbon and mixed media were disposed of at the Arlington Landfill. The remaining sediment in the affected areas were covered with a 6-foot thick cap of sand, gravel, and rip rap. A post-construction sediment cap inspection was conducted in 1990. • The 1994 Phase III Revised Final Site Investigation Report for Station L; see the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. The soil was remediated to approximately 1 ppm PCBs. In addition, the majority of soil was also remediated for other chemicals to levels below background and/or less than regulatory screening levels. More than 10,000 tons of PCB-containing soil/materials and more than 3,000 tons of soils/materials containing non-PCB contaminants (i.e., petroleum hydrocarbons and metals) were removed from Station L and disposed of at appropriate facilities. For further details, see the response and documents to Question 21. Since the groundwater beneath Parcel A had BTEX concentrations above applicable screening	

EPA Question	Response	Records/Information Available
	criteria, an air sparging remediation system was installed at Parcel A in 1994 to reduce the BTEX concentrations in the groundwater. See the documents (Q15_1993-12-20 Conceptual Design Air Sprg Sys.pd and Q15_1994 AS-1 ASRS Construction Log.pdf, and Q15_1994-1995 GW Air Sparging Results.pdf) attached in response to Question 15, as well as the documents (Q50_1993-07-23 CH2MHill to DEQ.pdf, Q50_1993-08-09 DEQ to CH2MHill.pdf, Q50_1994-02-23 CH2MHill-Brown to DEQ-Burnet.pdf, Q50_1994-04-13 CH2MHill-Wuttig to DEQ-Burton.pdf, Q50_1994-05-12 CH2MHill-Wuttig to WRD-Carter.pdf, and Q50_1994-06-20 CH2MHill-Wuttig to WRD-Carter.pdf) attached in response to Question 50. Under Phase I and Phase II consent order requirements, PGE completed the remediation of PCB-contaminated river sediments in 1990. In April 1991, the Oregon DEQ issued a certificate of completion indicating that PGE had met the Phase I and Phase II consent order requirements; see the document (Q50_1991-04-17 Cert of Completion for Phase I & II.pdf) attached in response to Question 50. CH2MHill, on behalf of PGE, conducted yearly inspections of the sediment cap from 1991 to 1994; see the document (Q15_1991&1994 CH2MHill Cap Inspections.pdf) attached in response to Question 15, which provides the available 1991 and 1994 inspection reports. To the best of PGE's knowledge after reasonable inquiry, PGE has not located copies of the 1992 and 1993 inspection reports. The Oregon DEQ then approved an inspection schedule of every five years or after major flood events, whichever occurred first. Under Phase III consent order requirements, PGE completed the remediation of the uplands portion of Station L and the investigation of groundwater in 1994. In June 1991, PGE received a "NFA" determination for the USTs at Station L; see the document (Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf) attached in response to Question 50. In November 1993, the Oregon DEQ issued an Order of Completion for Station L Phase III; see the document (Q50_1993-11-16 DEQ Order of Completion.pdf) attached in response to Question 50. In September 1994, PGE received a final "NFA" for Station L in Oregon DEQ's Station L Phase III ROD; see the document (Q50_1994-09-26 Phase III ROD.pdf) attached in response to Question 50. The USEPA completed a Site Investigation of Station L in August 1994; see the document (Q15_1994-08-09 EPA Site Investigation Report.pdf) attached in response to Question 15. Based on their site investigation and other pertinent information, the USEPA found it appropriate to refer to state authority for Station L and did not anticipate further investigation for Station L under the Federal Superfund Program. In 1995, PGE removed the dock and dolphins adjacent to Parcel I, including ACM dock steam piping, prior to selling this parcel to KPTV that same year; see the laboratory results (Q15_1995-08-29_Asbestos Lab Results.pdf) attached in response to Question 15. In 1996, the sediment cap was inspected by CH2MHill following a flood event; see the attached document (Q15_1996 CH2MHill Cap Inspection.pdf). The sediment cap was also inspected in 2001 and 2006 by Bridgewater Group, on behalf of PGE; see the inspection reports (Q15_2001&2006 Bridgewater Cap Inspections.pdf) attached in response to Question 15 and the 2001 and 2006 sediment cap inspection videos (Q15_2001-12-14 Inspection Disc 1.wmv, Q15_2001-12-14 Inspection Disc 2.wmv, and Q15_2006 OMSI Shore Survey.wmv) attached in	

EPA Question	Response	Records/Information Available
	response to Question 15. The Station L cap has remained stable and there is no evidence of erosion. The cap is planned for re-inspection in 2011. PGE continued to monitor the groundwater beneath Parcel A at varying intervals; see the progress reports (Q15_1994-1998 CH2M_Air Sparging Progress Reports.pdf) attached in response to Question 15. Due to the decline of BTEX concentrations in groundwater beneath Parcel A and because the air sparging remediation system had reached its threshold of effectiveness, the air sparging remediation system was abandoned in January 1998, including the abandonment of the monitoring wells and process wells. See the document (Q15_1998-07-23 Well Abandonment Plan.pdf) attached in response to Question 15, as well as the documents (Q50_1997-12-29 DEQ-Kiernan to PGE-Norton.pdf, Q50_1998-01-16 PGE-Norton to DEQ-Kiernan.pdf, and Q50_1998-01-22 DEQ-Kiernan to PGE-Norton.pdf) attached in response to Question 50. Photographs taken during the remedial activities at Station L are attached in response to Question 15 (Q15_1987-10-09_Photos - Market Street Garage.pdf, Q15_1989-03-15 Photos.pdf, Q15_1989-09-06 Photos - Asphalt Sampling.pdf, Q15_1989-1991 Photos_CH2MHill_Air Sprg Vol1of3.pdf, Q15_1990-07-30 Photos - CH2MHill - Phase II.pdf, Q15_1990-08 Photos_CH2MHill_Air Sprg Vol2of3.pdf, Q15_1990 Photos_CH2MHill_Air Sprg Vol3of3.pdf, Q15_1991-10-14 Photos - CH2MHill.pdf, Q15_1991-10-18 Photos - CH2MHill.pdf, Q15_1991-11-18 Photos - CH2MHill.pdf, Q15_1992-01-10 Photos - CH2MHill.pdf, Q15_1993-12-27 Photos - CH2MHill.pdf, Q15_Photos - CH2MHill - Phase 3.pdf, and Q15_CH2MHill Sediment Remediation Photos.pdf). The SPCC Plans (Q19_1980 SPCC.pdf and Q19_1980 SPCC.pdf), attached in response to Question 19, briefly describe topography and soil conditions at Station L Substation. For information regarding the disposal of wastes and materials, see the response to Question 21. See the plats (Q04_2006 Plats.pdf and Q04_Plats.pdf) attached in response to Question 4, as well as the responses and documents attached for Questions 15, 50, 52, and 62.	
a. a May 20, 1988 release of 20 gallons of 400 parts per million PCB transformer oil; b. a February 9, 1995 release of 5 gallons of oil that spilled from a bushing on the ground; c. a February 24, 1997 release of 20 gallons of 19 parts per million PCB transformer oil onto the ground, and; d. a July 25, 1997 release of 3 gallons of less than 5 parts per million	Not applicable. Questions 71a through 71e are not relevant to Station L. Information regarding these investigations is provided in the 104(e) response for the Harborton Substation.	

EPA Question	Response	Records/Information Available
PCB oil from a break on the ground, and;. e. a December 4, 1997 release of 40 gallons of cable oil onto the ground following vandalism at the Harborton substation.		
72. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.	After retirement of the Station L power plant in 1975, PGE evaluated several alternatives for the future development of Station L, including donation of the property. PGE decided to donate the northern 18 acres of Station L (Parcels A through F) to OMSI. Title for this portion of Station L passed from PGE to OMSI on 31 December 1986. Because PGE had stored electrical equipment containing PCBs in some areas of Station L, PGE retained the responsibility for cleaning up PCB contamination and for the removal of all ACM on the donated land as a contingency of the donation. To fulfill this obligation, PGE embarked on an uplands investigation and cleanup program at Station L. This initial investigation resulted in the identification of several areas of PCB contamination (≥50 ppm) in 1986. • Between October and November 1986, PGE removed surface soil at locations of elevated PCB concentrations (≥50 ppm) in the trench area and near the turbine building, resulting in the disposal of approximately 430 tons of PCB-containing soil, rock, and solid waste cleanup material at the Arlington Landfill; see the document (Q21c_1986-1987 TSCA HW Manifests.pdf) attached in response to Question 21c. • In 1986/1987, ACM was removed from the old transformer storage yard. The approximately 8 to 9 cubic yards of ACM were disposed of at the Circle C Landfill in 1987; see the documents (Q21c_1987-03-12 Bill of Lading.pdf and Q21c_1987-08-19 Bill of Lading.pdf) attached in response to Question 21c. Further soil testing in early 1987 identified additional areas of PCB contamination (≥50 ppm), including along the shoreline adjacent to the turbine room). Although, river sediments contamination was not suspected at Station L prior to the initial uplands site investigations, it became apparent that the potential existed for PCB-contaminated materials to have migrated into the river, west of the turbine building. In addition to further uplands investigations, PGE sampled and analyzed the river water and sediment, which resulted in PCB detections in the sediment. PGE collected additional sediment samples to determine the extent of contamination and found that an approximately 80- by 120-foot area contained PCB concentrations ranging from non-detect to 286 ppm. Based on the nature and extent of PCB-contaminated sediment, it appeared that the PCBs came from a source at the edge of the river next to the turbine building. A review of historical PGE records showed that a transformer on the west side of the turbine building failed in April 1971 and released askarel oil (>500 ppm PCBs); see the response and documents (Q62_1987-06-15 Memo on Historical PCB.pdf, Q62_1987-06-22 Sta L Memo-Spill April 1971.pdf, and Q62_1987-06-24_PGE Phone Memo_1971 spill.pdf) attached for	See all Question 15 Attachments Also see all Question 21 Attachments Also see Question 50 Attachments Also see Question 51 Attachments Q51_1986-04-18&30 Spill Correspondances.pdf Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf Q51_1986-10-14 EPA Inspection PCB Violations.pdf Q51_1986-11-14 EPA - TSCA Violation.pdf Q51_1986-11-19 Sta L Memo_Spill.pdf Q51_1986-12-03 Sta L Spill Procedures.pdf Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf Also see all Question 52 Attachments Also see all Question 53 Attachments Also see all Question 62 Attachments

EPA Question	Response	Records/Information Available
	Question 62. To the best of PGE's knowledge, after reasonable inquiry, this transformer was abandoned in place in 1971 and removed from Station L in 1987. However, to the best of PGE's knowledge, after reasonable inquiry, PGE does not know where it was transported or disposed; see the document (Q21a_1991-05-24_PGE_1971 Spill Transformer.pdf) attached in response to Question 21a. In June 1987, PGE entered into the Oregon DEQ's Voluntary Cleanup Program PGE began soil, sediment, surface water, and groundwater investigations under the cleanup program. In March 1988, PGE submitted a RAP to the Oregon DEQ for remediation of PCB-contaminated sediments next to the turbine building; see the documents (Q15_1988-02-29 HC RAP Vol I.pdf and Q15_1988-02-29 HC RAP Vol II.pdf) attached in response to Question 15. The Oregon DEQ requested that PGE enter into a consent order covering the entire Station L facility before PGE began its proposed remedial action. • Between June and November 1987, a total of 2,486.9 tons of PCB-containing soil were removed from X Area, Y Area, Stephens Substation (eastern border), the Underground Tank Area, the service road, Conveyor Drive Areas, the Sumps, the Poulsen Building, and the Turbine Area; see the document (Q15_1987-12-31 HC Removal of PCB Soils & DR.pdf) attached in response to Question 15. The PCB-containing soil was disposed of at Arlington Landfill; see the documents (Q21c_1986-1987 TSCA HW Manifests.pdf, Q21c_1987 CWM_HazMat Disposal Invoices.pdf, and Q21c_1988-01-13 PCB Trans report.pdf) attached in response to Question 21c. • Between April 1987 and May 1988, PGE removed and disposed of (recycled) liquid RCRA waste/materials and liquid non-regulated waste/materials from Station L. To the best of PGE's knowledge, after reasonable inquiry, these materials were from the Central Division Garage, prior to its relocation to outside of the Investigation Area. Under the Station L USEPA HWG ID number (ORD981764376), PGE disposed of approximately 18,585 lbs of waste petroleum hydrocarbons (liquid ignitable waste) and 585 lbs of halogenated solvents (liquid) at Safety Kleen; 900 gallons of waste oil with halogenated solvents and 55 gallons of petroleum solvents at Sol-Pro/Lilyblad Inc; and 450 gallons of a mixture of oil with halogenated solvents and 110 gallons of oil with non-halogenated solvents at McClary Columbia. See the document (Q21c_1987-1988 RCRA HW Manifests.pdf) attached in response to Question 21c. In August 1988, PGE entered into a three-phase consent order (DEQ No. ECSR-NWR-88-02) to identify the nature and extent of hazardous substances over the entire Station L property (Parcels A through I) and Stephens Substation (addressed in a separate 104(e) response); see the document (Q50_1988-08-03 DEQ Order of Consent.pdf) attached in response to Question 50. Phase I investigated/remediated the PCB contamination of the Willamette River shoreline (above the ordinary low water line) adjacent to the turbine building, Phase II investigated/remediated the PCB contamination of the Willamette River underwater sediments (below the ordinary low water line), and Phase III investigated/remediated hazardous substances contamination (if any) of groundwater, surface water, structures, soils, and other	

EPA Question	Response	Records/Information Available
	Station L sediments. The following summarizes the waste and materials removed during the Station L remedial activities under the under the OMSI donation contingency and the Oregon DEQ consent order: • In 1988, PGE completed the Phase I consent order requirements by remediating the shoreline adjacent to the turbine building to an average concentration of 1 ppm PCBs; see the document (Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf) attached in response to Question 15. A total of approximately 80 tons of soil/sediment were excavated. A total of approximately 174.3 tons of soil/sediment, debris, and concrete were removed and disposed of at the Envirosafe Services of Idaho Inc landfill; see Appendix B in the document (Q15_1988-11-21 HAI CR- Phase I Removal of PCBs.pdf) attached in response to Question 15. • In 1989, PGE pumped, treated, and discharged the water contents from two of the Station L USTs (likely EY-03 and EY-04) into the municipal sanitary sewer. To the best of PGE's knowledge, after reasonable inquiry, PGE also discharged the contents of the 226 waste drums that had been stored in the HP boiler room basement. See the documents (Q50_1989-03-06_PGE to BES_UST Discharge.pdf and Q50_1989-05-22_PGE to BES_UST Discharge.pdf) attached in response to Question 50, the documents (Q21a_1986-09-23 OMNI Drum Strg Sampling Rpt.pdf and Q21_1988-01-14_Disposal of Barrels in Station L.pdf) attached in response to Question 21c, and the document (Q52_1989-09-18_PGE Memo on UST Decom.pdf) attached in response to Question 52. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know the total quantity of water discharged into the sewer. • In 1989, PGE removed the remaining ACM from Station L. Approximately 285 tons of ACM were removed and disposed of at the St Johns Landfill; see the documents (Q21c_1989 St. Johns Landfill Receipts.pdf) attached in response to Question 21c. A total of approximately 62,750 gallons of treated (filtered) ACM-contaminated waste water, generated from washing equipment, building interiors, and personnel, were discharged to the municipal sanitary sewer under a City of Portland special discharge permit; see the document (Q50_1989-10-25 COP to PGE_Asbestos.pdf) attached in response to Question 50. During the discharges, asbestos-containing water was inadvertently discharged to the sewer due to an apparent failure in the filtration system. Also see the attached associated documents (Q21c_1988-01-11 PGE-HMS Contract.pdf, Q21c_1989-01-18 Asbestos Removal Contract.pdf, Q21c_1989-01-25_OMSI-PGE Asbestos Agrmnt.pdf, Q21c_1989-03-23 PAS Memo.pdf, Q21c_1989-04-04 PAS Memo.pdf, Q21c_1989-06-13 HMS Memo.pdf, Q21c_1989-10-02 HMS Memo.pdf, and Q21c_1989-10-04 Water Disposal Work Plan.pdf). For further details, see the responses to Question 13g, 15, 21, and 51. • In March 1990, OMSI was granted permission to discharge water (rainwater) into the Willamette River from two open USTs, which had been emptied and cleaned by PGE	

EPA Question	Response	Records/Information Available
	prior to OMSI taking possession. Prior to the discharge of the water from these two OMSI USTs and due to OMSI demolition activities, water from these tanks entered into a third UST that PGE was in the process of cleaning. Because the water was sourced from the two OMSI USTs, PGE sent a letter to the Oregon DEQ, Water Quality Section in May 1990 requesting permission to discharge the water from PGE's UST to the Willamette River under the OMSI Special Permit. See the documents (Q52_1990-05-10 Modification Request.pdf and Q52_1990-03-20 OMSI Permit Request.pdf) attached in response to Question 52. To the best of PGE's knowledge, after reasonable inquiry, PGE was granted permission. • In 1990, PGE completed the Phase II consent order requirements by remediating the impacted river sediment adjacent to the turbine building to an average concentration of 1 ppm; see the document (Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf) attached in response to Question 15. The following summarizes the treatment or disposal of media and waste: o A total of approximately 535,700 gallons of water were treated (filtered) with the sediment dewatering and water treatment facility and then discharged back into the river under a temporary (two-month) NPDES permit; see Appendices B, G, and J in the document (Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf) attached in response to Question 15. For further detail, see the response to Question 13g. o A total of 17 tons of sediment and miscellaneous debris were removed from the river. The 17 tons of sediment/debris and 23.5 tons of carbon and mixed media were disposed of at the Arlington Landfill; see Appendix K in the document (Q15_1991-01-11 CH2MH_Final Ph II_PCB Remed.pdf) attached in response to Question 15. Also see the attached associated documents (Q21c_1990-08-17 Disposal of PCBs.pdf and Q21c_1990-08-24 PGE-Chapman to CWM-Santos.pdf). • In April 1991, the Oregon DEQ issued a certificate of completion indicating that PGE had met the Phase I and Phase II consent order requirements; see the document (Q50_1991-04-17 Cert of Completion for Phase I & II.pdf) attached in response to Question 50. • In 1994, PGE completed the Phase III consent order requirements by remediating the soil to approximately 1 ppm PCBs and remediating the majority of soil for other chemicals to levels below background and/or less than regulatory screening levels; see the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. Of the more than 10,000 tons of PCB-containing soil/materials, more than 3,000 tons of soils/materials contained non-PCB contaminants (e.g., petroleum hydrocarbons and metals), and other liquid and solid waste/materials (e.g., RCRA waste) removed from Station L. The following highlights the treatment and/or disposal of soil and other special waste generated during the Phase III remediation (1988-1998):	

EPA Question	Response	Records/Information Available
	o In 1989, under the Station L USEPA HWG ID number (ORD 981764376), PGE removed liquid RCRA waste (ignitable waste, halogenated solvents, non-halogenated solvents, and/or lead and cadmium waste) with non-regulated cleaning solution (phosphates, soap, and water) from Station L, of which 2,374 gallons were disposed of at Sol-Pro Inc, 580 lbs were disposed of at Environmental Pacific Corp, and 719 lbs were recycled at Safety Kleen; see the document (Q21c_1989 RCRA HW Manifests.pdf) attached in response to Question 21c. o In 1989, PGE disposed of approximately 645 tons of asphalt with low levels of PCBs (<2 ppm) from Station L at the St Johns Landfill under a special waste permit from Metro; see the document (Q21c_1989-10 St. Johns Landfill Receipts.pdf) attached in response to Question 21. Also see Appendix C of the document (Q15_1989-1991 SEUA Soil Sampling Docs.pdf) attached in response to Question 15. o Between 1989 and 1994, approximately 5,700 tons of PCB-containing soil were disposed of at Arlington Landfill; see the documents (Q21c_1989 TSCA HW Manifests.pdf and Q21c_1994 TSCA HW Manifests.pdf) attached in response to Question 21c o In 1990, approximately 160 cubic yards of metal-containing soil removed from near the former machine shop were disposed of at the St. Johns Landfill under special permit; see the documents (Q21c_1990-08-28 Waste Disposal App.pdf and Q21c_1990-08-29 Waste Disposal Auth & App.pdf) attached in response to Question 21c. o In 1991, approximately 630 cubic yards of petroleum hydrocarbon-containing soil were disposed of at the Hillsboro Landfill; see the document (Q21c_1991-02 Hillsboro Dump Tickets.pdf, Q21c_1991-08-15 Waste Disposal App.pdf, and Q21c_1991-08-20 Hillsboro Dump Tickets.pdf) attached in response to Question 21c. o In 1990/1991, approximately 2,650 cubic yards of petroleum-hydrocarbon soil from around the USTs in Parcel A were excavated and moved to the portion of Station L owned by PGE at that time (Parcel H and/or Parcel I). The soil was treated by spreading and aeration from June 1990 to March 1991. By February 1991, the total petroleum hydrocarbon concentration in the soil ranged from 24 to 46 ppm (below the 80 mg/kg cleanup level for TPH). For further details, see the document (Q15_1994-08 CH2M_Phase III_Site Invest RevFinal.pdf) attached in response to Question 15. o In 1994, under the Station L USEPA HWG ID number (ORD987185204), approximately 250 gallons of non-regulated tank rinsate water and 285 lbs of non-regulated empty drums were disposed of at the Arlington Landfill; see the documents (Q21c_1994 Non-Reg HW Manifests.pdf and Q21c_1993-12-13 Non-Reg Waste Profile.pdf) attached in response to Question 21c. o In 1994, an air sparging remediation system was installed to reduce the BTEX concentrations in the groundwater under Parcel A. During the installation of this system, investigation derived waste was generated: soil drill cuttings with	

EPA Question	Response	Records/Information Available
	petroleum hydrocarbons, monitoring well purge water with BTEX, and decontamination water. Approximately 2,133 tons of petroleum hydrocarbon-containing soil were thermally treated at Oregon Hydrocarbons/TPS Technologies; see the document (Q21c_1994 Soil Certificates.pdf and Q21c_1994-07-15 Soils Disposal Non-HW Manifest.pdf) attached in response to Question 21c. Under the Station L USEPA HWG ID number (ORD987185204), approximately 1,525 gallons of RCRA monitoring well purge water (ignitable waste) and non-regulated decontamination water were disposed of at Chemical Waste Management in Colorado; see the documents (Q21c_1994 RCRA HW Manifests.pdf and Q21c_1993-12-13 RCRA Waste Profile.pdf) attached in response to Question 21c. Also see the associated memos (Q21c_1994-03-30 Drummed Soil and Water.pdf and Q21c_1994-07-08 Disposal of Investigation Wst Water.pdf) attached in response to Question 21c. Soil and other materials/wastes were either transferred directly to the appropriate disposal facility or to one of a PGE waste and used materials handling facilities for interim storage prior to disposal. Additional waste documentation from the Phase III remedial activities is provided in the documents (Q21c_1988-08-01 PCB trans report.pdf, Q21c_1988-10-14 PCB trans report.pdf, Q21c_1989-07-20 UST Content Disposal Req.pdf, Q21c_1989-08-21 PCB trans report.pdf, Q21c_1989 HW Generation Report.pdf, Q21c_1989 HW Shipment Record.pdf, Q21c_1990-01-19 PCB Trans Record.pdf, Q21c_1990-08-29 Waste Disposal Auth & App.pdf, Q21c_1991-07-22 Invoice.pdf, Q21c_1992-10-6 Soil Incineration.pdf, Q21c_1994-03-30 NonHW Drums.pdf, Q21c_1994-06-06 PCB_control sheet.pdf, Q21c_1994-06-13 Waste Profile-PCB.pdf, and Q21c_1994 CWM_HazMat Disposal Invoices.pdf) attached in response to Question 21c. • In June 1991, PGE received a "NFA" determination for the USTs at Station L; see the document (Q50_1991-06-20 DEQ-Garner to PGE-Norton.pdf) attached in response to Question 50. In November 1993, the Oregon DEQ issued an Order of Completion for Station L Phase III; see the document (Q50_1993-11-16 DEQ Order of Completion.pdf) attached in response to Question 50. In September 1994, PGE received a final "NFA" for Station L in Oregon DEQ's Station L Phase III ROD; see the document (Q50_1994-09-26 Phase III ROD.pdf) attached in response to Question 50. The USEPA completed a Site Investigation of Station L in August 1994; see the document (Q15_1994-08-09 EPA Site Investigation Report.pdf) attached in response to Question 15. Based on their site investigation and other pertinent information, the USEPA found it appropriate to refer to state authority for Station L and did not anticipate further investigation for Station L under the Federal Superfund Program. • Due to the decline of BTEX concentrations in groundwater and because the air sparging remediation system had reached its threshold of effectiveness, the air sparging remediation system, including the monitoring wells (W-8 through W-11) and process wells (AS-1 through AS-7), was abandoned in January 1998. In March 1998,	

EPA Question	Response	Records/Information Available
	4.5 tons of soil cuttings with petroleum hydrocarbons generated during the air sparging remediation system abandonment were disposed of at Oregon Hydrocarbons/TPS Technologies; see the documents (Q21c_1998-02-19 Soils Disposal Non-HW Manifest.pdf and Q21c_1998-03-02 Soils Disposal Non-Haz Manifest.pdf) attached in response to Question 21c. Soil, gravel, and absorbents were also removed from Station L in response to spills/releases. To the best of PGE's knowledge, after reasonable inquiry, the following presents known and available information with respect to specific releases that occurred at Station L (other than the 1971 transformer spill and the remedial activities already discussed, above): • 10 April 1980 and 9 June 1980 – Two non-PGE sourced discharges occurred from the storm drain that runs through Station L into the Willamette River; see the document (Q62_1980_Non-PGE Sourced Spills.pdf) attached in response to Question 62. PGE reported these non-PGE discharges to the Oregon DEQ. • 18 April 1986 – Approximately 5-25 gallons of PCB-containing oil (91-107 ppm) from an oil tank spilled onto gravel in the Station L tank farm; see the document (Q62_1986-04-18 Spill Report.pdf) attached in response to Question 62. The spill occurred during the transfer of insulating oil into a holding tank. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD 86-203), contained, and cleaned up (including the removal and disposal of the PCB-containing gravel and soil. The PCB and petroleum hydrocarbon-containing soil/gravel was disposed of at the Arlington Landfill after interim storage at PSC, a PGE waste and used materials handling facility; see the document (Q21c_1986-04-22 PCB trans report.pdf) attached in response to Question 21c. Also see the response and documents (Q51_1986-04-18&30 Spill Correspondances.pdf, Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf, Q51_1986-10-14 EPA Inspection PCB Violations.pdf, Q51_1986-11-14 EPA - TSCA Violation.pdf, Q51_1986-11-19 Sta L Memo_Spill.pdf, Q51_1986-12-03 Sta L Spill Procedures.pdf, Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf, Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf, Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf, and Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf) attached for Question 51. • 30 April 1986 – Approximately 1 gallon of PCB-containing oil (66 ppm) from an oil tank spilled onto gravel in the Station L tank farm; see the document (Q62_1986-04-30 Spill Report.pdf) attached in response to Question 62. The spill occurred during the PCB-containing oil decontamination activities by Sun Ohio Corporation. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD 86-178), contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the PCB and petroleum hydrocarbon-containing soil/gravel was likely disposed of at Arlington Landfill after interim storage at a PGE waste and used materials handling facility. Also see the response and documents (Q51_1986-04-18&30 Spill	

EPA Question	Response	Records/Information Available
	Correspondances.pdf, Q51_1986-05-16 Sta L Memo_EPA Investigation.pdf, Q51_1986-10-14 EPA Inspection PCB Violations.pdf, Q51_1986-11-14 EPA - TSCA Violation.pdf, Q51_1986-11-19 Sta L Memo_Spill.pdf, Q51_1986-12-03 Sta L Spill Procedures.pdf, Q51_1987-03-04 PGE-Wihtol to EPA-Dabroski.pdf, Q51_1987-06-30 CL EPA-Dabroski to PGE-Wihtol.pdf, Q51_1987-08-06 PGE to EPA_TSCA Payment.pdf, and Q51_1987-08-18 EPA to PGE_TSCA Agreed Order.pdf) attached for Question 51. • 18 September 1986 – Approximately 60 gallons of PCB-containing oil (0.4 ppm) were released into the gravel and soil at PGE's Market Street Garage when a UST underground oil pipe ruptured; see the document (Q62_1986-09-18_1701 SE Water.pdf) attached in response to Question 62. The released oil drained into two dry wells in the garage parking lot. The spill was reported to the PGE System Control Center and the Oregon DEQ (EMD 86-483), contained, and cleaned up (including the PCB-containing absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB and petroleum hydrocarbon-containing absorbent was likely disposed of at the Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 6 November 1986 – Approximately 2 gallons of PCB-containing oil (approximately 300 ppm) from Oil Storage Tank #6 were spilled onto the gravel in the Station L tank farm; see the document (Q62_1986-11-06 Oil Spill Report.pdf) attached in response to Question 62. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). The PCB and petroleum hydrocarbon-containing soil/gravel was disposed of at the Arlington Landfill after interim storage at Sellwood Substation, a PGE waste and used materials handling facility; see the document (Q21c_1986-11-06 Spill Disposal.pdf) attached in response to Question 21. • 28 January 1987 – Approximately 10-15 gallons of PCB-containing oil (77 ppm) were released onto the gravel and migrated to surface water within the Station L tank farm; see the document (Q62_1987-01-28 Oil Spill Questionaire.pdf) attached in response to Question 62. The spill occurred when a tanker truck leaked while transferring oil to containers within the tank farm. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel, soil, and absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB- and petroleum hydrocarbon-containing soil/gravel/absorbent was likely disposed of at Arlington Landfill after interim storage at a PGE waste and used materials handling facility. Confirmation sampling was conducted to ensure cleanup; the confirmation composite soil sample had a PCB concentration of 0.32 ppm. • 16 March 1987 – Approximately 5 gallons of PCB-containing oil (20 ppm) spilled onto gravel in the Station L tank farm; see the document (Q62_1987-03-16 Oil Spill Questionaire.pdf) attached in response to Question 62. The spill occurred when the	

EPA Question	Response	Records/Information Available
	• 23 April 1987 – Approximately 45 gallons of PCB-containing oil (1 ppm) were released from a pole-mounted transformer onto the gravel in the Station L storage yard when a truck struck the pole. To the best of PGE's knowledge, after reasonable inquiry, the petroleum hydrocarbon-containing soil/gravel was likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 7 June 1988 – Approximately 0.03 gallons of PCB-containing insulating oil (35 ppm) and water from an emptied 5 kVA transformer were released onto the asphalt at Station L; see the document (Q62_1988-06-07 Oil Spill Questionaire.pdf) attached in response to Question 62. The spill was caused when thieves tipped over a training transformer (empty with some water inside). The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing absorbent). To the best of PGE's knowledge, after reasonable inquiry, the PCB- and petroleum hydrocarbon-containing absorbent was likely disposed of at Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 2 February 1989 – Approximately 2 gallons of oil and water were released onto PGE's asphalt parking area when five barrels of oil and water froze and burst; see the document (Q62_1989-02-07 Oil Spill Questionaire.pdf) attached in response to Question 62. The lab results of the oil/water were non-detect for PCBs. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of the absorbent). To the best of PGE's knowledge, after reasonable inquiry, the 14 drums of petroleum hydrocarbon-contaminated absorbent were likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 13 September 1993 – Approximately 1 gallon of PCB-containing oil (9 ppm) from a concrete fuel tank spilled onto gravel; see the document (Q62_1993-09-13 Oil Spill Report.pdf) attached in response to Question 62. The spill occurred while EMCON (a PGE contractor) was sampling the tank, which was believed to have been empty. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of PCB-containing gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the approximately 8 cubic feet of petroleum hydrocarbon-containing soil/gravel were likely disposed of at Hillsboro	

EPA Question	Response	Records/Information Available
	Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. • 3 November 1993 – Approximately 50-70 gallons of diesel fuel were released from the tank farm pipeline onto gravel within the Station L tank farm; see the document (Q62_1993-11-03 Oil Spill Questionaire.pdf) attached in response to Question 62. The spill occurred while O'Sullivan (a PGE contractor) was disassembling piping from the pump house to the tank farm. The spill was reported to the PGE System Control Center and the Oregon DEQ, contained, and cleaned up (including the removal and disposal of gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, the approximately 150 square feet of petroleum hydrocarbon-containing soil/gravel were likely disposed of at Hillsboro Landfill or Columbia Ridge Landfill after interim storage at a PGE waste and used materials handling facility. In 1995, PGE removed the wooden dock and dolphins adjacent to Parcel I, including ACM dock steam piping, prior to selling this parcel to KPTV that same year. Approximately 6.3 cubic yards of ACM were disposed of at the Hillsboro Landfill; see the document (Q21c_1995-08-29 ACM Waste Shipment.pdf) attached in response to Question 21c. To the best of PGE's knowledge, after reasonable inquiry, the non-ACM dock and dolphin waste also likely were disposed of at the Hillsboro Landfill. See the responses and documents for Questions 15, 21, 50, 52, 53, and 62. Also see the separate 104(e) response for Stephens Substation, the separate 104(e) response for Harborton Substation, which was historically a PGE waste and used materials handling facility within the Investigation Area, and the supplemental submittal of documentation from other PGE facilities that may have received waste and used materials from Station L (Supplemental Submittal S7).	
73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, and hydrology or air quality on or about the Property? If so, identify: a. what the nature and scope of these investigations will be; b. the contractors or other persons that will undertake these investigations; c. the purpose of the investigations; d. the dates when such investigations will take place and be completed; and e. where on the Property such	PGE no longer owns the Station L property; no future investigations are planned. However, PGE will continue to inspect the sediment cap in the Willamette River next to Station L (next to Parcels D and E), as specified in the Station L Phase II Record of Decision (ROD) (Q50_1990-02-26 Phase II ROD.pdf) attached in response to Question 50. The USEPA completed a Site Investigation of Station L in August 1994; see the document (Q15_1994-08-09 EPA Site Investigation Report.pdf) attached in response to Question 15. Based on EPA's site investigation and other pertinent information, the USEPA found it appropriate to refer to state authority for Station L and did not anticipate further investigation for Station L under the Federal Superfund Program. Station L received a "NFA" determination by Oregon DEQ on 26 September 1994, as detailed in the document (Q50_1994-09-26 Phase III ROD.pdf) attached in response to Question 50.	See Question 15 Attachment Q15_1994-08-09 EPA Site Investigation Report.pdf Also see Question 50 Attachments Q50_1990-02-26 Phase II ROD.pdf Q50_1994-09-26 Phase III ROD.pdf

EPA Question	Response	Records/Information Available
investigations will take place.		
Section 8.0 - Corporate Information		
74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:	Responses and documents for Section 8.0 – Corporate Information for all PGE sites are provided in a supplemental submittal (Supplemental Submittal S1).	
a. state the current legal ownership structure (e.g.. corporation, sole proprietorship);		
b. state the names and current addresses of all current and past owners of the business entity or, if a corporation, current and past officers and directors;		
c. discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;		
d. the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and		

EPA Question	Response	Records/Information Available
e. if your- business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.		
75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:		
a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;		
b. names, addresses, and telephone numbers of all registered agents, officers and operations management personnel; and		
c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.		
d. all information requested in (a) through (c) above regarding, but not limited to, the following entities and including their relationship to Respondent (e.g. whether these entities are business partners, separate entities, subsidiaries, and/or aliases etc. of Respondent):		
i. V & K Service, Inc.; and		
ii. Jinkz Corp.		

EPA Question	Response	Records/Information Available
76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.		
77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:		
a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;		
b. the dates such relationship existed;		
c. the percentage of ownership of Respondent that is held by such other entity(ies);		
d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;		

EPA Question	Response	Records/Information Available
e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and		
f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.		
g. all information requested in (a) through (f) above regarding, if applicable, but also explain any corporate or financial relationship Respondent may have had or has with the Enron Corporation.		
78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.		
Section 9.0 - Compliance With This Request		
79. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:		
a. the name and current job title of all	Ron Parr, Facility Management Supervisor Bob Millican, Facility Management Specialist	Question 79 Attachment Q79_PdxHarbor Contact Information Rev.pdf

EPA Question	Response	Records/Information Available
individuals consulted;	Randy Nicolay, Facility Management Specialist Dave VanBossuyt; Distribution Administration Manager Mark Cooksey, IT Client Services Manager Laura Holgate, Power Supply Eng Services Supervisor Jeddy Beasley, Transportation Services Manager Jayne Allen, Environmental Services Specialist Arya Behbehani-Divers, Environmental Services Manager Brandy Horn, Environmental Services Specialist Mike Livingston, Property Services Manager Tim Calhoun, Network Communications Supervisor – retired Mike Schwartz, Power Supply Eng Services General Manager Rand Sherwood, Utility Services Manager Tom Stodd, Environmental Services Specialist Bob Lazrine Special Tester Forman Sid Hiller – Manager Kristina Rodgers – Assistant Debby Klinger – Specialist Chuck McCartney – Specialist Alma McGloghlon – Analyst Larry Morgan – Supervisor Gwen Williams - Manager In addition, the attached document contains additional sources consulted for responses to selected questions.	
b. the location where all sources reviewed are currently reside; and	PGE's Office at: 121 SW Salmon, 1WTC1302, Portland, Oregon 97204. Records are contained in the Facilities Management Departments, the Human Resources Department, and in the Corporate Records Information System (CRIS) database. In addition, the Hawthorne Retiree Museum contains the following: • The History of Portland General Electric Company, 1889 - 1981 • Electrifying Eden by Craig Wollner The History of Portland General Electric Company, 1989 - 1981 is attached in response to Question 77, which is part of the Supplemental Submittal S1. A hardcopy of Electrifying Eden was provided in a separate submittal.	
c. the date consulted.	Work on this information request was performed from February 2008 through October 2009.	
80. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than	See responses and documents for Questions 2, 6g, 21, 38, 40, and 79.	See all Question 6 Attachments Also see all Question 21 Attachments Also see all Question 38 Attachments

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attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous materials at, or transportation of hazardous substances, waste, or materials to or from each Property identified in response to Question 4.		Also see Question 40 Attachment Q40_Waste-Materials Receivers and Carriers.pdf Also see Question 79 Attachment Q79_PdxHarbor Contact Information Rev.pdf
81. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following;	PGE Records Management Services (RMS) provides a uniform records management program for the company. The program includes the Corporate Records Information System (CRIS) an online application used by departments to identify, index, and manage their records. RMS also provides records storage and retrieval and document imaging services. RMS can investigate why records are no longer available if we know which records are being sought. Knowing the date, originator, and subject of the records in question are essential to determine their availability or their ultimate disposition. Each unique record category is identified in CRIS and assigned a file pattern code (file category). Information about each file category includes the office of record (originator), and retention requirements and regulatory citations – who requires the record to be kept and for how long. The PGE records program and records retention schedule comply with the recordkeeping requirements of the Oregon Public Utility Commission (PUC) and Federal Energy Regulatory Commission (FERC). State and federal guidelines require us to identify which records PGE produces and how and for how long those records will be retained. PGE Policy requires that records should not be destroyed before or kept after meeting retention requirements. Consequently, PGE regularly destroys records in the normal course of business and when legally required to do so. Such destructions are approved by the PGE Records Retention Committee and authenticated and recorded by RMS. How long a particular type of record is retained is based on operating needs, legal and regulatory requirements and, in a few cases, historical or archival value.	
a. the document retention policy between 1937 and the present;	RMS was created in 1977 and we can provide PGE's records management guidelines from 1977 to the present. Prior to that time, records management was the responsibility of each functional area, plant, or division office. Accounting records were kept in compliance with 18 CFR Part 125, Regulations to Govern the Preservation of Records of Public Utilities and Licensees (1972), issued by the Federal Power Commission (now FERC) and NARUC, the Nat'l Assoc. of Regulatory Utility Commissioners.	
b. the approximate date of	See response to Question 81a, above. Since it was established (c. 1977) RMS has maintained a hardcopy or microfilm record of boxes of records destroyed in the normal course of business,	

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destruction;	if those records were turned over to RMS custodianship. To know *when* a record was destroyed, it is necessary to know the record category, the approximate date of creation, and which department created it. It should be noted that the level of detail of information about the records destroyed is the same as that used to identify the records when they were sent to storage.	
c. a description of the type of information that would have been contained in the documents;	See response to Question 81b, above. RMS can help discern what records were typically filed in a particular file category. If similar records from that era exist, they may show what information was captured by the documents. For example, a typical "job" form from 1980 would include much the same information listed on a similar job form from 1940, i.e., the work location, equipment used, labor hours, parts, drawings, etc.	
d. the name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for destroying the documents; and the person(s) who had and/or still have the originals or copies of these documents; and	RMS is responsible for all records sent to the records center from 1977 to present, including ultimate disposition of those records. Records of documents destroyed include the names of the originator, authorizations for destruction (signatures) and the name of the person who physically destroyed or recycled the documents. Individual Responsibility Center (RC) managers are and would have been responsible for maintaining and disposing all other records, i.e., those that were not sent to the archives.	
e. the names and most current addresses of any person(s) who may possess documents relevant to this inquiry.	RMS can provide printed reports from the CRIS of existing records related to the request (that have been entered into CRIS by the originating RC). CRIS shows the names of all departments using the system for managing their records, what categories of records are maintained and where the records are filed (in the department or the records storage center). On request, RMS can provide a list of all RCs that use the CRIS system. This report would show each RC's file plan by document type (or subject) and the types of documents that should be filed under those headings.	
82. Provide a description of all records available to you that relate to all of the questions in this request, but which have not been included in your responses.	Multiple key word searches were performed in PGE's CRIS system. No date restrictions were placed on the searches. The results from each key word search were printed from the CRIS system with either a list of record titles or a "There are no entities to display" message. The "There are no entities to display" message means that based on the search query no records were found. Individual CRIS printouts are available upon request but provide no additional information. Documents not included in this request are: • Documents describing other PGE sites • PGE internal emails, correspondences, documents not specifically relevant to these questions	

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	• Documents determined to be Attorney-Client privileged, which are identified on the comprehensive privilege log that will be submitted with the final set of responses • Duplicate or draft documents/figures • Database of OSHA reportable accidents/injuries for PGE properties in Oregon • Two general information documents: Theory on Sand Berms, and Theory on Oil Spill Containment Products • Title/appraisal documents • Site health and safety plans for remedial activities • Field notes, daily logs, job instructions for remedial activities (remedial activities are summarized in the reports attached in response to Question 15) • Cost proposals for remediation/environmental consultants • Invoices/payment records for remediation and environmental consultants, laboratory analysis • Oregon DEQ to PGE comments on draft reports	